

From: Brazier, Heather M CSCD:EX
To: Roigans, Trudy CSCD:EX
Subject: FW: Summary of Stakeholder Meetings re Expense Limits
Date: Wednesday, July 29, 2015 10:24:11 AM

This might be helpful to share with the team.

Heather

From: Brazier, Heather M CSCD:EX
Sent: Wednesday, July 29, 2015 10:23 AM
To: Reimer.MLA, Linda LASS:EX
Cc: Dick, Joan L CSCD:EX; Ok-Stone, Angella CSCD:EX
Subject: Summary of Stakeholder Meetings re Expense Limits

Hello Parliamentary Secretary Reimer. s.22

I've

prepared notes summarizing the key issues that arose from the July 23 stakeholder meetings; the final list of attendees is attached. Please let me know if any revisions are required. You may wish to send the final version to Minister Oakes.

Regards,

Heather

s.13

Page 002

Withheld pursuant to/removed as

s.13

s.13

Heather Brazier
Executive Lead
Integrated Policy, Legislation and Operations Division
Ministry of Community, Sport and Cultural Development
Phone: 250 387-3880
Cell: 250 812-9195
E-mail: Heather.Brazier@gov.bc.ca

As per s.13(1) of FOIPPA,
text to be redacted

Stewart, D'Arcy CSCD:EX

From: s.22
Sent: Friday, July 31, 2015 7:39 PM
To: Rotgans, Trudy CSCD:EX
Subject: Re: Request for Comments: Local Elections Expense Limits for Third Party Advertisers

Since I spent only about \$300.00 for my third party sponsorship, this seems fine to me.

s.22

On Jul 31, 2015, at 12:06 PM, Rotgans, Trudy CSCD:EX wrote:

UPDATED: Due to vacation schedules, we'd appreciate your comments by **Wednesday, August 12th**. For further information please feel free to contact Miriam Starkl-Moser, A/Director, Integrated Legislation at Miriam.starklmoser@gov.bc.ca or 250-387-4017. Thank you again.

From: Rotgans, Trudy CSCD:EX
Sent: Friday, July 31, 2015 10:04 AM
To: Clausen, Chantel CSCD:EX
Subject: Request for Comments: Local Elections Expense Limits for Third Party Advertisers
Greetings,

I am writing to request your comments on local elections expense limits for third party advertisers. As you may be aware, the provincial government has committed to implement expense limits for the next local government elections in 2018, for both candidates and third party advertisers. On June 26, 2015, the Special Committee on Local Elections Expense Limits released its Final Report: <http://www.leg.bc.ca/cmt/40thParl/session-4/leel/reports/PDF/Rpt-LEEL-40-4-FinalReport-2015-JUN-26.pdf>, which includes recommendations for expense limits amounts. As a third party advertiser in one of B.C.'s smaller communities, we have identified recommendations that may affect you:

- It is recommended that mayoral candidates would have an expense limit of \$10,000 and candidates in all other locally elected offices would have an expense limit of \$5,000.
- It is recommended that third party advertisers would have an expense limit of 5 percent of the expense limit of a mayoral candidate in municipal elections or 5 percent of the expense limit of a candidate in those races where there is no mayoral candidate (e.g. for school trustee or regional electoral area director) and that \$150,000 be an overarching, cumulative limit.

Under the Special Committee's recommendations, a third party advertiser in a jurisdiction with a population of less than 10,000 would therefore have an expense limit of \$500 if there is a mayoral candidates, and \$250 if there is not a mayoral candidate.

We are seeking your views on whether these recommended limits would allow for reasonable third party advertising activities. Comments on other recommendations of the Special Committee are also welcome.

We would appreciate receiving your comments no later than Wednesday, August 12th.

Your assistance is highly valued and appreciated and we look forward to hearing from you. For further information please feel free to contact Miriam Starkl-Moser, A/Director, Integrated Legislation at Miriam.starklmoser@gov.bc.ca or 250-387-4017.

Best regards,

Trudy Rotgans | A/Senior Director, Integrated Policy Branch

Ministry of Community, Sport and Cultural Development
6th Floor, 800 Johnson Street Victoria, BC V8W 9T2
Phone: 250-356-7875 Mobile: 250-888-0591
Email: trudy.rotgans@gov.bc.ca

Stewart, D'Arcy CSCD:EX

From: s.22
Sent: Friday, July 31, 2015 3:29 PM
To: Rotgans, Trudy CSCD:EX
Cc: Clausen, Chantel CSCD:EX
Subject: Fwd: Request for Comments: Local Elections Expense Limits for Third Party Advertisers
Attachments: 2015-casual rates .pdf; PW ad sizes 2012 .pdf

Kaslo

Friday July 31st

Dear Trudy,

Further to your email of earlier today please find attached current pricing for ads in the Pennywise, noting I was a third party advertiser in the Kootenay Lake/Nelson RR#1 and 3 area that covered Electoral Area D. Given that the contest in Electoral Area D is without a Mayor the maximum ad allowable could only cost \$250. This would allow for one three quarter page ad thrice.

I actually took out a full page ad, but would not have been able to do that under the rules being proposed. The population of Electoral Area D is currently 1,403 and the number of residential and non-residential registered voters was around 1,000.

Finally I trust that any expense limits will be tied to the consumer price index.

I will send you some costings for radio ads, noting a third party advertiser would likely only be able to undertake a newspaper or radio ad and not both.

Respectfully

s.22

>From: Julie <julie@pennywiseads.com>
>Date: Fri, 31 Jul 2015 12:17:53 -0700
>To: s.22
>
>Hello s.22
>
>Here please find the cost to run up to three ads (3 separate ad
>placements) over a period of 15 weeks, as well as the ad sizes that
>correspond with these prices.
>
>Do note, the ad rates that you received last fall are from our
>'Vigorous Program' that we offered you for your Director's Corner
>placements, and do not apply in this circumstance.
>
>If you have further questions, feel free to contact me here or give me
>a call at s.22
>
>Thank you s.22

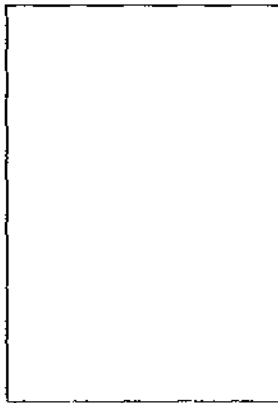
>Julie
>
>Julie Wilson
>Advertising Consultant
>250-353-2602, 1-800-663-4619
>julie@pennywiseads.com <<mailto:julie@pennywiseads.com>> pennywiseads.com
><<http://pennywiseads.com/>>
>>Friday July 31st
>>
>>Julie, I have been asked to comment on a proposed \$250 limit for third
>>party advertisers under 10,000 voters in local government elections in
>>BC and would remind you that I did do an ad during the
>>2014 local government election. If you could comment back to me on the
>>provincial government's proposal I would very much appreciate it.
>>
>>Cheers

s.22

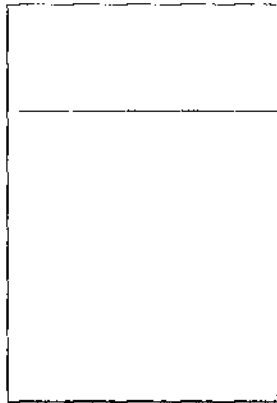
This email has been checked for viruses by Avast antivirus software.
<https://www.avast.com/antivirus>



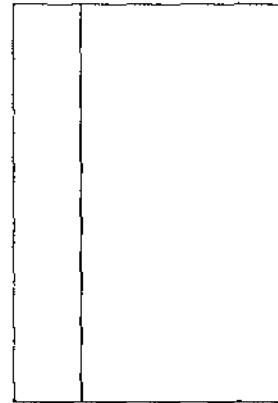
Ad Sizes & Shapes



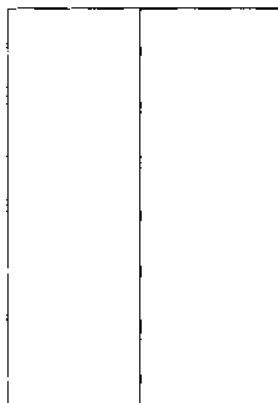
1 page
6.75" wide x 9.7" high
(40p6 wide x 58p3 high)



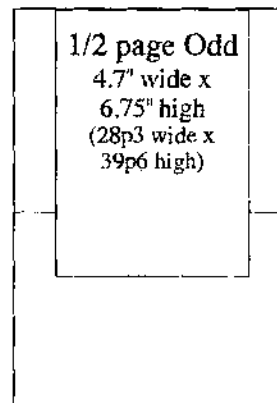
3/4 page Horizontal
6.75" wide x 7.25" high
(40p6 wide x 43p6 high)



3/4 page Vertical
5" wide x 9.7" high
(30p3 wide x 58p3 high)

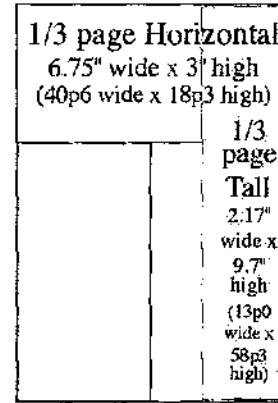


1/2 page Vertical
3.25" wide x 9.7" high
(19p6 wide x 58p3 high)



1/2 page Odd
4.7" wide x
6.75" high
(28p3 wide x
39p6 high)

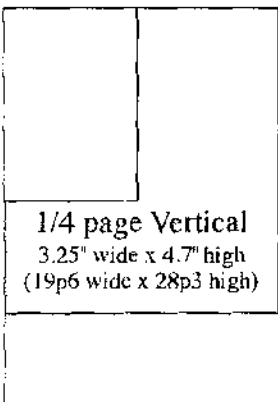
1/2 page Horizontal
6.75" wide x 4.7" high
(40p6 wide x 28p3 high)



1/3 page Horizontal
6.75" wide x 3" high
(40p6 wide x 18p3 high)

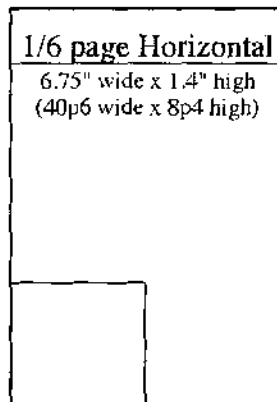
1/3 page Tall
2.17" wide x
9.7" high
(13p0 wide x
58p3 high)

1/3 page Vertical
3.25" wide x 6.375" high
(19p6 wide x 38p3 high)



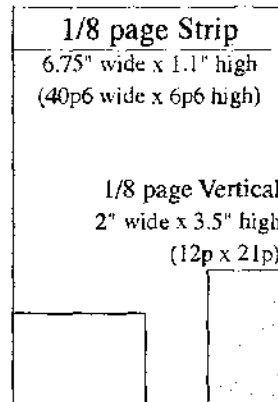
1/4 page Vertical
3.25" wide x 4.7" high
(19p6 wide x 28p3 high)

1/4 page Horizontal
6.75" wide x 2.25" high
(40p6 wide x 13p6 high)



1/6 page Horizontal
6.75" wide x 1.4" high
(40p6 wide x 8p4 high)

1/6 page Vertical
3.25" wide x 3" high
(19p6 wide x 18p high)



1/8 page Strip
6.75" wide x 1.1" high
(40p6 wide x 6p6 high)

1/8 page Vertical
2" wide x 3.5" high
(12p x 21p)

1/8 page Horizontal
3.25" wide x 2.25" high
(19p6 wide x 13p6 high)

JULIE WILSON
Toll Free: 1-800-663-4619
250-353-2602
Fax 250-353-7444
julie@pennywiseads.com



Head Office
401 A Ave
Box 403, Kaslo B.C.
V0G 1M0

CASUAL DISPLAY AD RATES

EFFECTIVE JANUARY 1, 2015

Over 26,000 copies printed weekly,
plus 3000+ web visits.

Additional savings when you book your
display ad in more than one area.

4 area editions are published each week.
Choose Total Coverage – All 4 Editions

OR Area Specific Advertising:

- (1) Nelson/Salmo
- (2) Kootenay Lake/Nelson RR#1&3
- (3) Castlegar/Slocan Valley
- (4) Trail/Rossland/Beaver Valley

CASUAL PROGRAM - PRICE PER INSERTION

	Single Area	2 Areas	3 Areas	All Areas
1/8 page	\$65.69	\$101.72	\$145.71	\$181.64
1/6 page	\$86.43	\$140.64	\$198.99	\$246.44
1/4 page	\$107.17	\$179.60	\$252.33	\$311.28
1/3 page	\$149.58	\$239.80	\$341.67	\$426.44
1/2 page	\$191.95	\$300.02	\$431.01	\$541.68
3/4 page	\$246.59	\$396.40	\$542.61	\$649.60
Full page	\$301.22	\$475.92	\$648.42	\$793.60

+GST

You can earn a lower rate package! Ask your sales rep.

Display ad size, content, area(s) chosen and timing of display ad insertions
are always flexible within your program.



10% OFF AD COST when paid before deadline

EARLY PROOF DEADLINE - Wednesday 12 noon (all copy must be in by this time)

DISPLAY AD DEADLINE - Thursday 3 pm (all copy must be in by this time)

Position Charges

(no discounts, subject to availability)

Front Page

1/4 page
all area editions..... \$225
(includes colour)

Burst

(includes colour)..... \$50

Centre Spread

(2 pages - Double Truck)
position only..... \$230
• includes extra ad space through the centre
• includes 10% discount on colour charges

+GST

Back Page

Full page
all 4 editions..... \$335
(includes colour)

Inside

(colour NOT included)
1/2 - 1 page
per area edition \$55
all area editions..... \$140
1/8 - 1/3 page
per edition..... \$40
all area editions..... \$100

Colour Charges

(no discounts,
subject to availability)

ONE COLOUR

1 page or 3/4 page \$90
1/2 page..... \$80
1/3 page or less \$70

FULL COLOUR

2 pages \$400
1 page \$250
1/2 page \$170
1/3 page or less ... \$125

+GST

Pennywise

Feel Free to Contact
Julie Wilson

Ph. 250-853-2602
or Toll Free 1-800-663-4619
email julie@pennywiseads.com

Stewart, D'Arcy CSCD:EX

From: s.22
Sent: Sunday, August 9, 2015 9:40 PM
To: Rotgans, Trudy CSCD:EX
Cc: Clausen, Chantel CSCD:EX; Starkl-Moser, Miriam CSCD:EX; OfficeofthePremier, Office PREM:EX; Minister, CSCD CSCD:EX; Fin Anthony
Subject: Re: Request for Comments: Local Elections Expense Limits for Third Party Advertisers

Hello,

Thank you for the inquiry.

Has anyone bothered to ask why Sechelt was such an anomaly on third party advertising spending? In my humble opinion, we had serious problems here in Sechelt and many of us believe that third party advertising was a big part of the solution. If these ridiculously low limits are imposed, I pity the next community that has problems like Sechelt had to deal with.

Please be kind enough to forward all further information on this topic to me.

Sincerely,

s.22

Sechelt

On Fri, Jul 31, 2015 at 12:06 PM, Rotgans, Trudy CSCD:EX <Trudy.Rotgans@gov.bc.ca> wrote:

UPDATED: Due to vacation schedules, we'd appreciate your comments by **Wednesday, August 12th**. For further information please feel free to contact Miriam Starkl-Moser, A/Director, Integrated Legislation at Miriam.starklmoser@gov.bc.ca or 250-387-4017. Thank you again.

From: Rotgans, Trudy CSCD:EX
Sent: Friday, July 31, 2015 10:04 AM
To: Clausen, Chantel CSCD:EX
Subject: Request for Comments: Local Elections Expense Limits for Third Party Advertisers

Greetings,

I am writing to request your comments on local elections expense limits for third party advertisers.

As you may be aware, the provincial government has committed to implement expense limits for the next local government elections in 2018, for both candidates and third party advertisers.

On June 26, 2015, the Special Committee on Local Elections Expense Limits released its Final Report: <http://www.leg.bc.ca/cmt/40thParl/session-4/leel/reports/PDF/Rpt-LEEL-40-4-FinalReport-2015-JUN-26.pdf>, which includes recommendations for expense limits amounts.

As a third party advertiser in one of B.C.'s smaller communities, we have identified recommendations that may affect you:

- It is recommended that mayoral candidates would have an expense limit of \$10,000 and candidates in all other locally elected offices would have an expense limit of \$5,000.

- It is recommended that third party advertisers would have an expense limit of 5 percent of the expense limit of a mayoral candidate in municipal elections or 5 percent of the expense limit of a candidate in those races where there is no mayoral candidate (e.g. for school trustee or regional electoral area director) and that \$150,000 be an overarching, cumulative limit.

Under the Special Committee's recommendations, a third party advertiser in a jurisdiction with a population of less than 10,000 would therefore have an expense limit of \$500 if there is a mayoral candidates, and \$250 if there is not a mayoral candidate.

We are seeking your views on whether these recommended limits would allow for reasonable third party advertising activities. Comments on other recommendations of the Special Committee are also welcome.

We would appreciate receiving your comments no later than Wednesday, August 12th.

Your assistance is highly valued and appreciated and we look forward to hearing from you. For further information please feel free to contact Miriam Starkl-Moser, A/Director, Integrated Legislation at Miriam.starklmoser@gov.bc.ca or 250-387-4017.

Best regards,

Trudy Rotgans | A/Senior Director, Integrated Policy Branch

Ministry of Community, Sport and Cultural Development

6th Floor, 800 Johnson Street Victoria, BC V8W 9T2

Phone: [250-356-7875](tel:250-356-7875) Mobile: [250-888-0591](tel:250-888-0591)

Email: trudy.rotgans@gov.bc.ca

Stewart, D'Arcy CSCD:EX

From: Michael Hoebel s.22
Sent: Monday, August 10, 2015 9:51 AM
To: Rotgans, Trudy CSCD:EX
Cc: Linda Ruedrich
Subject: Fwd: Request for Comments: Local Elections Expense Limits for Third Party Advertisers

Dear Ms. Rogans:

The Galiano Health Care Society was a "third party advertiser" in last November's municipal election for the purpose of promoting a "Yes" vote on a Capital Regional District contribution service bylaw to fund a portion of the Galiano Health Care Centre's operating expenses. As such, the recommendations regarding spending limits that you cite with respect to mayoral or other candidates would not have applied to our situation, and it isn't clear what spending limit might be applicable for a referendum campaign.

However, I would comment that the proposed limit(s) on spending for candidates (\$250 - \$500) by a third part advertiser seem quite low, given that the costs to place advertising in even our small local print media, to print and mail flyers to all the households in our community, and to print posters could easily exceed the proposed limits.

Regards,
Michael Hoebel
President, Galiano Health Care Society

From: Rotgans, Trudy CSCD:EX [mailto:Trudy.Rotgans@gov.bc.ca]
Sent: Friday, July 31, 2015 10:04 AM
To: Clausen, Chantel CSCD:EX <Chantel.Clausen@gov.bc.ca>
Subject: Request for Comments: Local Elections Expense Limits for Third Party Advertisers

Greetings,

I am writing to request your comments on local elections expense limits for third party advertisers.

As you may be aware, the provincial government has committed to implement expense limits for the next local government elections in 2018, for both candidates and third party advertisers.

On June 26, 2015, the Special Committee on Local Elections Expense Limits released its Final Report:

<http://www.leg.bc.ca/cmt/40thParl/session-4/leel/reports/PDF/Rpt-LEEL-40-4-FinalReport-2015-JUN-26.pdf>, which includes recommendations for expense limits amounts.

As a third party advertiser in one of B.C.'s smaller communities, we have identified recommendations that may affect you:

- It is recommended that mayoral candidates would have an expense limit of \$10,000 and candidates in all other locally elected offices would have an expense limit of \$5,000.
- It is recommended that third party advertisers would have an expense limit of 5 percent of the expense limit of a mayoral candidate in municipal elections or 5 percent of the expense limit of a candidate in those races where there is no mayoral candidate (e.g. for school trustee or regional electoral area director) and that \$150,000 be an overarching, cumulative limit.

Under the Special Committee's recommendations, a third party advertiser in a jurisdiction with a population of less than 10,000 would therefore have an expense limit of \$500 if there is a mayoral candidates, and \$250 if there is not a mayoral candidate.

We are seeking your views on whether these recommended limits would allow for reasonable third party advertising activities. Comments on other recommendations of the Special Committee are also welcome.

We would appreciate receiving your comments no later than Monday August 17, 2015.

Your assistance is highly valued and appreciated and we look forward to hearing from you. For further information please feel free to contact the undersigned at Trudy.Rotgans@gov.bc.ca or 250-888-0591.

Best regards,

Trudy Rotgans | A/Senior Director, Integrated Policy Branch

Ministry of Community, Sport and Cultural Development

6th Floor, 800 Johnson Street Victoria, BC V8W 9T2

Phone: 250-356-7875 Mobile: 250-888-0591

Email: trudy.rotgans@gov.bc.ca

From: s.22
Sent: Monday, August 10, 2015 9:20 AM
To: Starkl-Moser, Miriam CSCD:EX; Rotgans, Trudy CSCD:EX
Subject: Special Committee on Local Elections Expense Limits - Third Party Spending Limits Unrealistic - Municipal Elections

Dear Ms. Starkl-Moser and Ms. Rotgans:

Re: Special Committee on Local Elections Expense Limits - Third Party Spending Limits Unrealistic - Municipal Elections

I understand that the Special Committee on Local Elections Expense Limits is recommendations that a third party advertiser in a jurisdiction with a population of less than 10,000 would have an expense limit of \$500 if there is a mayoral candidates, and \$250 if there is not a mayoral candidate.

While I understand and support the logic behind some manner of spending limits those limits must take in account what advertising costs actually are and what it takes for advertising to be effective. To be effective, an advertising message needs to get a single reader multiple times for it to register once. That requires still greater repetition given that most people will miss most ads most of the time.

In our community of Sechelt, \$500 would pay for two very small ads in our local weekly newspaper. It would not cover the cost of printing a single 8 1/2" x 11" sheet of paper in B&W, for distribution to every household, let alone cover the cost of a single mail drop. A single radio spot would be out of reach.

If the limits also required accounting for the creative and/or graphic design work, that alone could use up the budget without producing a single piece of paper for public distribution.

The extremely low spending limits being recommended effectively constitute a defacto ban on third party advertising, and would, I suggest, be subject to a successful Charter challenge as constituting an unwarranted restriction on Canadian's rights to freedom of expression and communication. If asked, the courts would pronounce their judgement taking into consideration the actual costs of third party communication in deciding whether the imposed spending limits constituted an unreasonable violation of the Charter.

I strongly suggest your Special Committee research the actual costs of advertising, inclusive of the creative/graphic design work, in a number of smaller communities around British Columbia before recommending spending specific limits. In so doing, you would be creating a realistic and defensible framework for municipal election campaigns that might avoid the aforementioned Charter challenges.

All of which is respectfully submitted.

Sincerely,

s.22

Stewart, D'Arcy CSCD:EX

From: s.22
Sent: Monday, August 10, 2015 12:41 PM
To: Starkl-Moser, Miriam CSCD:EX
Subject: We had a big problem in Sechelt with our last Mayor

We had a Billionaire Mayor by the name of John Henderson running this town like it was a cow town in the wild west. All the citizens of Sechelt had to stand up and help kick the *&^(&^ out of town. He spent all our money on a sewage Plant 25 million dollars and still growing. Took out a loan for 4.7 million dollars that we will be paying for till 2024. He did all this to keep the sewage plant away from his home - A NIMBY MAYOR OF THE WORST KIND and did all this in three years. We need every one that could to spend money to get this (&*^&^\$%\$%# person off the street and out of City Hall. It will take us years to clean up the mess. WE COULD HAVE BUILT THE SEWAGE PLANT IN THE RIGHT PLACE AND SOLD THE LAND IN THE MIDDLE OF SECHELT WHERE THE SEWAGE PLANT IS NOW AND MADE MONEY . WE HAD THE MONEY TO DO ALL THIS AND COME OUT WITH A LITTLE MONEY AHEAD. SOME OF US ARE REALLY MAD. We had to have lots of money from private citizens like myself s.22 to get rid of this person and his gang of four council. Private citizens should be able to spend up to two thousand dollars. Very upset citizen s.22



Stewart, D'Arcy CSCD:EX

From: Rotgans, Trudy CSCD:EX
Sent: Monday, August 10, 2015 9:29 AM
To: Starkl-Moser, Miriam CSCD:EX
Cc: Clausen, Chantel CSCD:EX
Subject: Fwd: Request for Comments: Local Elections Expense Limits for Third Party Advertisers

Sent from my iPad

Begin forwarded message:

From: s.22
Date: August 8, 2015 at 8:30:13 AM PDT
To: "Rotgans, Trudy CSCD:EX" <Trudy.Rotgans@gov.bc.ca>
Subject: Fwd: Request for Comments: Local Elections Expense Limits for Third Party Advertisers

Kaslo

Saturday August 8th

Trudy, this is to advise that in response to your earlier request for comments for a spending limit of \$250 in election populations under 10,000 where no mayoralty candidate is running a third party advertiser would be restricted to 15 thirty second commercials on the Juice FM in Area D of the Regional District Central Kootenay. Thus in my experience, without knowing if this limit is indexed to inflation, I believe third party advertising would be restricted to either a less than full page (8 by 11) ad in the Pennywise Paper or 15 30 second radio spot commercials.

Further please note that wireless internet coverage in Area D is still not 100% available and Telus, for example, has discontinued dial up internet service, and Canada Post is only a twice a week delivery service in the rural areas around Kaslo, thus leaving Pennywise and the Juice FM as the only two alternate means of communication with the voters. I would therefore encourage the Committee to reconsider whether \$250 is not an excessively strict limit for remote areas of rural British Columbia where the means of communicating with the voters can be quite restricted and potentially expensive. Area D, for example, is 5,700 square kilometres and some electoral Areas, particularly in the North, are huge.

Respectfully submitted

s.22

s.22

Date: Wed, 5 Aug 2015 09:12:21 -0700
From: Danielle McGrath <dmcgrath@vistaradio.ca>

s.22

Most political parties will just run ads a few days before election, or even only on day before. As costs for stations differ the amount of ads available for \$250 can vary. As it stands now for 103.5 Juice FM, this would roughly get you 15 x 30 second commercials. While on short term amount of days this can be an effective push, radio advertising is always most successful with a high frequency, long term campaign.

I hope this message finds you well and helps assist in your efforts.

Thank you.

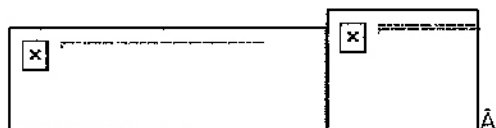
Danielle McGrath

Vista Radio - 103.5 Juice FM

Sales Executive

office: 250-352-1902 ext. 203

cell: 250-509-3009



On Tue, Aug 4, 2015 at 10:28 AM, s.22
Kaslo

wrote:

Tuesday August 4th

Danielle, below please find the question asked by the BC provincial government concerning third party advertising in an electoral area without a Mayor running. If you could please explain what \$250 would allow us to spend as a third party advertiser I would very much appreciate it.

Cheers

s.22

From: "Rotgans, Trudy CSCD:EX" <Trudy.Rotgans@gov.bc.ca>
To: "Clausen, Chantel CSCD:EX" <Chantel.Clausen@gov.bc.ca>
Subject: Request for Comments: Local Elections Expense Limits for Third Party
Date: Fri, 31 Jul 2015 17:04:19 +0000

Greetings,



This email has been checked for viruses by Avast antivirus software.
www.avast.com



This email has been checked for viruses by Avast antivirus software.
www.avast.com

Page 021 to/à Page 024

Withheld pursuant to/removed as

s.13

Consultation Feedback
Bill 43, Local Elections Campaign Financing (Expense Limits) Amendment Act

KEY ISSUES ONLY

Received	Community	Affiliation	Jan 1 st date	Funding Formula	Expense Limits	TPA limits	Contribution Limits	Complexity	Other
1. Website	Did not identify	Did not identify					Ban corporate and union donations		
2. Website	Did not identify	Did not identify					Contribution limits		Contribution disclosure during campaign
3. Website	North Vancouver	Did not identify					Contribution limits		
4. Website	North Saanich	EO	In favour but for both candidates and TPAs						
5. Website	Delta	EO: Financial Agent						Overly complex, particularly for small communities	Complexity will discourage participation
6. Website	Gibsons	Previously ran as a candidate.							Contribution disclosure during campaign
7. Website	References the City of Vancouver	TPA: Engaged Citizens			No limit on spending personal funds				
8. Website	North Saanich	TPA				Too low in smaller communities			

1

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Received	Community	Affiliation	Jan 1 st date	Funding Formula	Expense Limits	TPA limits	Contribution Limits	Complexity	Other
9. Website	City of Vancouver	City Clerk			Are fair		Contribution limits	Overly complicated for EOs	Concerned EOs can circumvent expense limits
10. Website (Hard copy followed)	Vancouver	"City Hall Watch" Petition					Ban corporate and union donations		
11. Website	Did not identify	Previously ran a campaign in local elections.					Contribution limits		EO candidates have an advantage over independent candidates.
12. Website	Vancouver	EO: Vancouver Non-Partisan Association (NPA)	Expense limit period should be the same for everyone	Add another population category at 500,000	Lower spending amounts for populations over 150,000	Limits okay for Vancouver area	Contribution limits Ban corporate and union donations		Require EOs to file annual disclosures in non-election years.
13. Website	Delta South	MLA Vicki Huntington					Ban corporate and union donations		
14. Website	Delta	Financial Agent for an EO and for a provincial candidate.	Against Jan 1 st date.					EOs allocating expense per candidate problematic and how will EBC monitor.	EO candidates have an advantage over independent candidates.

Received	Community	Affiliation	Jan 1 st date	Funding Formula	Expense Limits	TPA limits	Contribution Limits	Complexity	Other
15. Website	Lower Mainland	EO: The Coalition of Progressive Electors		EOs need a separate formula	Expense limits too high	TPA time period should be 60 days	Contribution limits	Overly complex especially for smaller EOs	Independent candidates should have a "top-off" to adjust for not having an organizational backer
16. Website	Province wide	TPA: CUPE BC				TPA limit too low in small communities			Expense limits for TPAs should NOT apply to assent voting
17. Website	Province wide	TPA: BCGEU				Province wide cap of \$150,000 is appropriate TPA limit too low in small communities			
18. Website	Vancouver	EO: Green Party of Vancouver	In favour of Jan 1 st date		Expense limits are too high		Contribution limits	Expense categories and reporting are overly complex	
19. Website	Vancouver	EO: Board of Directors - Green Party of Vancouver			Expense limits are too high in large cities		Contribution limits		Require EOs to file annual disclosures in non-election years.

Received	Community	Affiliation	Jan 1 st date	Funding Formula	Expense Limits	TPA limits	Contribution Limits	Complexity	Other
20. Website	Vancouver	Did not identify	TPA and candidates expense periods should be from Jan 1 st to Dec 31 st		Too high in Vancouver. Need to allow them to set lower spending limits EOs should have spending limits	Opposed to the \$150,000 cumulative limit Ban Union or Corporate donations to TPAs Different formula for TPAs should be applied to assent campaigns	Contribution limits Ban corporate and union donations	System is overly complex	Require EOs to file annual disclosures in non-election years. EO candidates have an advantage over independent candidates. Plebiscites such as the transit plebiscite should be covered by spending limits
21. Website	Richmond	EO: Richmond First Voters Society							Donations to civic candidates should be tax write-offs.
22. Website	Province Wide	BC School Trustee Association	Against having different expense timelines						

Received	Community	Affiliation	Jan 1 st date	Funding Formula	Expense Limits	TPA limits	Contribution Limits	Complexity	Other
23. Email MPF and PS Reimer	Province Wide	UBCM	Against having different expense timelines	Supports the formula		Supports expense limits for TPAs		Overly complex for small communities	Complexity may deter candidates from running.
24. Letter to MPF	City of Richmond	Mayor							EO candidates have an advantage over independent candidates. EOs do not turn over funds between elections as candidates are required to.
25. Email to MPF	Did not identify	Did not identify					Contribution limits		
26. Letter to MPF	City of Vancouver	Mayor Gregor Robertson					Contribution limits		
27. Email to MPF	West Vancouver	Did not identify					Contribution limits		Would like transparency so know who donors are in election and

Received	Community	Affiliation	Jan 1 st date	Funding Formula	Expense Limits	TPA limits	Contribution Limits	Complexity	Other
									non-election years.
28. Email to MPF	Did not identify	Did not identify			Expense limit for EOs running a full slate is too high		Contribution limits Ban corporate and union donations		
29. Email to MPF	Did not identify	Did not identify					Contribution limits Potential ban on corporate, union, and "affluent individual" donations		

Elections BC submitted comments on Bill 43. The comments received were technical in nature and are being addressed through a different process.

List of attendees for meetings July 23, 2015

All day:

- Parliamentary Secretary Linda Reimer
- Heather Brazier, Executive Lead, Ministry of Community, Sport and Cultural Development
- Joan Dick, Chief of Staff to Minister

9:30am – 12:00pm

- Jean Sickman, Richmond Citizens Assn.
- Jordan Bober, Green Party of Vancouver
- Andrea Reimer, Vision Vancouver
- Stepan Vdovine, Vision Vancouver
- Jason King, Non-Partisan Assn.
- Patrick O'Connor, Non-Partisan Assn.
- Stephen Bohus, Neighbourhoods for a Sustainable Vancouver
- Gerry McGuire, Vancouver Citizens' Voice
- Connie Hubbs, Coalition of Progressive Electors
- Anita Romaniuk, Coalition of Progressive Electors

1:00pm – 2:30pm

- Sian Madoc-Jones, BC Federation of Labour
- Tania Jarzebiak, Canadian Union of Public Employees BC
- Ian Reeve, Canadian Office and Professional Employees Union
- Rob Duffy, Sustainable Communities Initiative

2:30pm – 3:30pm

- Cancelled

Ministry of Community, Sport and Cultural Development
TWO PAGE SUMMARY OVERVIEW
FOR INFORMATION – For Executive Lead (IPLO)

Date: October 19, 2015

Title: Overview of consultation planning for local government election expense limits legislation

Purpose: To obtain direction on next steps for consultation on the exposure bill

Background:

- Consultation would begin when the bill is introduced on October 22, 2015.
- The consultation period will close on November 27, 2015.
- GCPE will issue a news release once the bill is introduced with information on submitting feedback via a CSCD website and email address.
- The proposed approach involves face-to-face meetings between the Parliamentary Secretary and key stakeholder groups.
- Additional communication, in partnership with UBCM, is under consideration for encouraging direct engagement with local governments on this consultation.

Consultation Content:

The consultation will be focused to the following topics:

- Expense limits amounts (e.g. too high, too low, or appropriate for jurisdiction sizes);
- Jurisdictional size categories (e.g. too many, too few or suitable size);
- Timeframe (e.g. January 1st for candidate limits);
- Third party advertising; and
- Enforcement and fines.

Timelines:

-
- October 22: Bill introduced.
- October 22: Consultation launched.
- Week of October 26: Invitation for face-to-face meetings with stakeholders.
- End of October: Letters to all local governments (in partnership with UBCM).
- Early to mid-November: Stakeholder meetings.
- November 27: Consultation period closes.
- December 31: Finalize analysis of results and consultation report.
- Mid-January: Prepare Cabinet submission summarizing feedback and requesting direction.
- Late January: Present Cabinet submission to Priorities and Planning Committee (P&P).
- Early February: If necessary, re-draft bill to reflect direction from P&P.
- February: If necessary, Legislative Review Committee.
- Spring 2015 session: Introduce amended bill or continue bill as introduced in Fall 2015 session.

Decision Points:

- Will face-to-face meetings be scheduled between the Parliamentary Secretary and stakeholders? If yes, which stakeholder groups require meetings? (see Appendix for list)
- Will a joint letter between the Parliamentary Secretary and UBCM be sent to local governments?
- What timing is preferred for the face to face meetings?

Next Steps:

- Finalize communication materials and tools;
 - Collaborate with the Ministry of Education on consultation plan; and
 - Implement consultation.
-

Appendix –Stakeholder Groups for Consultation

- UBCM
- LGMA
- Elections BC
- City of Vancouver
- BC School Trustees Association
- Business Organizations
- Elector Organizations (including but not limited to):
 - Richmond Citizens Assn.
 - Green Party of Vancouver
 - Vision Vancouver
 - Vision Victoria
 - Non-Partisan Assn.
 - Neighbourhoods for a Sustainable Vancouver
 - Vancouver Citizens' Voice
 - Coalition of Progressive Electors Coalition of Progressive Electors
- Unions (as third party advertisers) – including but not limited to:
 - BC Federation of Labour
 - Canadian Union of Public Employees BC
 - Canadian Office and Professional Employees Union
 - Sustainable Communities Initiative

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Withheld pursuant to/removed as

s.13

Local Government Elections Reform: Expense Limits

On October 22, 2015 the Minister of Community, Sport and Cultural Development introduced in the Legislative Assembly Bill 43 the *Local Elections Campaign Financing (Expense Limits) Amendment Act, 2015*. Bill 43 proposes changes to the *Local Elections Campaign Financing Act* to pave the way for the implementation of expense limits for candidates and third party advertisers in local government elections.

In 2010 the joint Provincial – Union of British Columbia Municipalities Local Government Elections Task Force recommended changes in five key areas to modernize local government campaign finance rules: ensure accountability; enhance transparency; strengthen compliance and enforcement; expand education and advice; and increase accessibility. Last year, the provincial government significantly modernized local government elections, including campaign finance rules. Expense limits will complete the implementation of the recommendations of the Local Government Elections Task Force.

Expense limits are important to accessibility and fairness. The intention of the proposed changes is that expense limits be reasonable, workable in different-sized communities, and not deter candidates from running. In October 2014, an all-party Special Committee on Local Elections Expense Limits convened to provide recommendations to support the development of legislation and regulations necessary to implement expense limits for local elections in 2018. The Committee's final report was published in June 2015.

Bill 43 follows the recommendations of the Special Committee on Local Elections Expense Limits, as outlined in its June, 2015 report. Specifically the Bill sets out the framework for expense limits. It is important to note that the amounts of the expense limits would be set by regulation.

By tabling the legislation during the current fall session, the provincial government is creating a final opportunity for consultation. The Province encourages local election participants, stakeholders and the public to provide input on the proposed approach to expense limits.

The proposed changes include:

- For candidates in election areas with a population of less than 10,000 people, the proposed expense limits would establish a flat rate of:
 - \$10,000 for mayoral candidates and
 - \$5,000 for all other locally-elected offices.

- In jurisdictions with a population of 10,000 or more:
 - a. Mayoral candidates will have an expense limit of
 - \$1 per capita for the first 15,000 population
 - \$0.55 per capita for the next 15,000 to 150,000 population
 - \$0.60 per capita for the next 150,000 to 250,000
 - \$0.15 per capita thereafter
 - b. Candidates for all other locally elected offices have an expense limit of:
 - \$0.50 per capita for the first 15,000 population
 - \$0.28 per capita for the next 15,000 to 150,000 population
 - \$0.30 per capita for the next 150,000 to 250,000 population
 - \$0.08 per capita thereafter.

The linked PDF is an example of what expense limits would have looked like, for mayor and council candidates in communities larger than 10,000, had the proposed framework been in place for the 2014 local elections: [Proposed Local Government expense limits for jurisdictions with populations over 10,000](#)

- Mayors have higher expense limits than other candidates.
- Expense limits would be adjusted for inflation.
- Expense limits would apply to both independent and endorsed candidates (the latter are affiliated with an elector organization).
 - Elector organizations would not have their own expense limits, but rather would share their endorsed candidates' expense limits through a "campaign financing arrangement" (CFA).
 - This respects the principle of neutrality, i.e., that expense limits should neither encourage or discourage candidates from joining elector organizations.
- Expense limits for candidates would apply from January 1 of the election year to election day (the third Saturday of October).
- Third-party advertisers would have an expense limit of 5 percent of the expense limit of a mayoral candidate in municipal elections or 5 percent of the expense limit of a candidate in those races where there is no mayoral candidate (e.g., for school trustee or regional electoral area director), with a \$150,000 overarching, cumulative limit. These expense limits would apply during a 28-day campaign period.

Submissions may wish to comment on the following questions:

1. Are the proposed expense limit amounts for candidates appropriate? Do the limits appear to be too high, too low, or about right for your community?
2. The funding formula includes a per capita amount (outlined above). Do the population categories work as they are currently defined? Would you recommend a different set of population groupings?
3. Are the proposed expense limits periods appropriate (January 1 to election day for candidates, 28 days prior to election day for third party advertisers)?
4. Are the proposed third party advertising expense limits appropriate?

All feedback on the questions above as well as all any additional submitted comments will be considered as part of the future implementation of local election expense limits.

Provide feedback [here](#).

Stewart, D'Arcy CSCD:EX

From: s.22
Sent: Friday, October 23, 2015 11:44 AM
To: Local Government Election Reform CSCD:EX
Subject: local government campaign expenses...proposed new law via Fassbender

Follow Up Flag: Follow up
Flag Status: Completed

Hello: Suggest the law needs to be expanded to limiting business and unions helping to fund candidates. There should be a law halting any business and unions from contributing funds to local/municipal candidates. Thank you.

s.22

Robertson, Tatiana CSCD:EX

From: Minister, CSCD CSCD:EX
Subject: FW: municipal electoral reform

From: Fassbender.MLA, Peter [<mailto:Peter.Fassbender.MLA@leg.bc.ca>]
Sent: Tuesday, October 27, 2015 10:09 AM
To: Minister, CSCD CSCD:EX
Subject: FW: municipal electoral reform

From: s.22
Sent: October 24, 2015 9:24 AM
To: Fassbender.MLA, Peter <Peter.Fassbender.MLA@leg.bc.ca>
Cc: Dann, Michelle CSCD:EX <Michelle.Dann@gov.bc.ca>; Tegart.MLA, Jackie <Jackie.Tegart.MLA@leg.bc.ca>
Subject: municipal electoral reform

Hi,

I am a bit disappointed by the municipal electoral reforms proposed. I would like to see a lower cap for parties running a full slate of candidates. Just under \$2.5 million is too high. A grassroots organization wouldn't be able to compete with that. Furthermore, union and corporate donations should be banned. It creates a perception that these groups have significant influence over how city councils govern. Even Vision Vancouver which had 2/3 of their donations from corporations in the last election is in favour of these restrictions. The public wants to feel that their voice is heard first and foremost. There should be a reasonable maximum cap on individual donations so as to create a level playing field. Thank you for your consideration.

Sincerely,
s.22

Consultation Plan

Expense Limit Exposure Bill

Bill 43: Local Elections Campaign Financing (Expense Limits) Amendment Act, 2015

Ministry of Community, Sport and Cultural Development
October 27, 2015

Purpose

To consult on Bill 43: *Local Elections Campaign Financing (Expense Limits) Amendment Act, 2015*, which would enable implementation of expense limits for the next local government elections in 2018. The proposed legislation was tabled in the Legislative Assembly as an exposure bill on October 22, 2015.

Audience

Targeted stakeholders:

- Union of BC Municipalities (UBCM);
- Elector organizations;
- Business organizations (as third party advertisers);
- Unions (as third party advertisers); and
- Other third party advertisers.

Additionally, members of the broader public may comment through the Ministry of Community, Sport and Cultural Development local government elections reform website.

Process / Timelines

- Pre-consultation / bill introduction: CSCD staff brief Minister, Deputy Minister, and ADM of Local Government Division; Minister briefs Parliamentary Secretary.
- Week of October 19: CSCD staff initiate discussion with UBCM staff regarding consultation.
- October 22: Bill introduced. Consultation website and news release launched (<http://www.cscd.gov.bc.ca/LocalGovtElectionReform/>).
- First week of November: Letters from Parliamentary Secretary to targeted stakeholders.
- During November: UBCM invites member local governments to comment.
- November 27: Consultation period closes.
- December 31: Finalize analysis of results and consultation report.

Targeted Stakeholders –Direct Contact

Organization	Meeting Type	Purpose/Materials Required	Deadline(s)
UBCM President	Call from Minister to President	Discussion with UBCM required regarding engagement with its members on the bill.	By Minister's Office Status: Complete
UBCM Staff	Phone calls and e-mails between CSCD IPLO Executive Lead and UBCM Executive Director	Discuss consultation approach that UBCM will take with its membership. CSCD has offered to provide supporting materials.	Status: Complete UBCM intends to post a Compass article and invite members to comment via CSCD's local elections reform website.
Elections BC	CSCD staff to contact Elections BC	Verbal update; advise about consultation process via CSCD website	End of October Status: Complete
Elector Organizations (see Appendix I)	Letter from Parliamentary Secretary	EO letter	Week of November 2
Third Party Advertisers (see Appendix II) • Unions • Business Organizations • Other	Letter from Parliamentary Secretary	TPA letter	Week of November 2
BC School Trustees Association And Conseil Scolaire Francophone	Coordination by Ministry of Education (MoE)	MoE to develop materials as necessary (aligned with CSCD materials)	Early November

Materials/Tools Required

Item	Content	Responsible	Deadline
1. Overview timeline and Roadmap visual summary	Visual representation of expense limits timeframes	CSCD Expense Limits Team	October 13 Status: Complete

Item	Content	Responsible	Deadline
2. Summary of proposed expense limits with examples	Overview to convey expense limits amounts through "plain language" communications	CSCD Expense Limits Team	October 20 Status: Complete
3. General news release	Inviting comment on exposure bill via website / email address	GCPE	October 21 Status: Complete
4. Updated expense limits website content	Refreshed content to be refreshed on website and key document links embedded http://www.cscd.gov.bc.ca/LocalGovtElectionReform/	CSCD Expense Limits Team	October 21 Status: Complete
5. Dedicated email account - localgovelectionreform@gov.bc.ca	Activate / reactivate account and tracking mechanism	CSCD Expense Limits Team	October 21 Status: Complete
6. Key messages for consultation process and engagement	High level messaging to be used for the consultation process	CSCD Expense Limits Team, GCPE	October 26 Status: Complete
7. Q and A internal materials for LGD Advisory Services	Overview Q and As for use by LGD for inquiries received; could be also added to CSCD consultation website	CSCD Expense Limits Team	November 3
8. Letter #1: Parliamentary Secretary to Elector Organizations	Explanation of exposure bill and proposed expense limits, invitation to comment	CSCD Expense Limits Team, Parliamentary Secretary	Week of November 2
9. Letter #2: Parliamentary Secretary to third party advertisers (i.e. unions, business organizations and other TPA)	Explanation of exposure bill and proposed expense limits, invitation to comment	CSCD Expense Limits Team, Parliamentary Secretary	Week of November 2
10. CivicInfoBC news release	Overview of expense limits and invitation to submit comments via CSCD website	CSCD Expense Limits Team	TBD – if UBCM Option 2 implemented

Key Messages

- The provincial government has committed to implementing expense limits for the next local government elections in British Columbia in 2018.
- Expense limits will apply to candidates, elector organizations and third-party advertisers.
- On October 22, 2015 the provincial government introduced Bill 43, the *Local Elections Campaign Financing (Expense Limits) Amendment Act, 2015* as an exposure bill.
- The legislation sets out the framework for expense limits; the actual amounts would be set by regulation.
- The bill follows the recommendations of the Special Committee on Local Elections Expense Limits, as outlined in its June, 2015 report.
- Further details about the proposed changes, a link to Bill 43, and information on providing feedback can be found here: <http://www.cscd.gov.bc.ca/LocalGovtElectionReform/>.
- Comments will be accepted until midnight on November 27, 2015.

Feedback – Key Questions

Overall feedback – CSCD Website Questions

Submissions may wish to comment on the following questions:

1. Are the proposed expense limit amounts for candidates appropriate? Do the limits appear to be too high, too low, or about right for your community?
2. The funding formula includes a per capita amount. Do the population categories work as they are currently defined? Would you recommend a different set of population groupings?
3. Are the proposed expense limits periods appropriate (January 1 to election day for candidates, 28 days prior to election day for third party advertisers)?
4. Are the proposed third party advertising expense limits appropriate?

In addition to the questions outlined above, it will be important to receive input from local governments (and UBCM executive) on two items in particular:

- Time period – feedback important as it is set in legislation.
- Expense limit numbers – additional feedback will inform drafting of regulations.

Consultation Feedback Summary

A summary of stakeholder feedback will be attached to any future Cabinet submissions regarding any recommended amendments to Bill 43 for the Spring 2016 Legislative session.

Appendix I – Elector Organizations

Abbotsford First
Greens
BCA - Burnaby Citizens Association
BFC - Burnaby First
Pro-Amalgamation
CCA
Delta Connect
Delta Independent Voters Association
Independents Working For You
Kids Matter
REAL
Bright Future Party
Prosper Kelowna
Tax Payers First
Live Langley
CRMG
Team North Saanich
Amalgamate North Van
Alberni First
Canada Electric Services Inc.
RCA
Renew Richmond
Richmond Community Coalition
Richmond First
Richmond Reform
RITE Richmond
One Surrey
Safe Surrey Coalition
Surrey First
TeamSurrey
Surrey First Education
Cedar Party
Coalition of Progressive Electors (COPE)
Green
Hotel Workers United
Local 40
IDEA
NPA
One City Vancouver
Stop Party
Vancouver 1st
Vision Vancouver
Public Education
Vancouver 1st
White Rock Coalition

Appendix II – Third Party Advertisers

**Education related third party advertisers may receive Ministry of Education specific letter/materials*

A Better City (ABC) Vancouver Association
Aldergrove Neighbours
Aldergrove Recreation and Pool Society
Association for Responsible and Environmentally Sustainable Sewage Treatment
B.C. Federation of Labour
BC Chamber of Commerce
BC Parents' Voice
Bowen Island Improvement Association
British Columbia Government and Service Employees' Union
British Columbia Maritime Employers Association
British Columbia Nurses' Union
British Columbia Teachers' Federation*
Brookwood Neighbours
Burnaby Teachers' Association*
Canadian Centre for Policy Alternatives - BC Office
Canadian Union of Public Employees - BC Division
Canadian Union of Public Employees Local 2262
Canadian Union of Public Employees Local 606
Canadian Union of Public Employees Local 622 Pitt Meadows and Maple Ridge
Canadian Union of Public Employees Local 703
Central Saanich West Voters Association
Chesterfield Sports Society
Chilliwack Teachers' Association*
Citizens For An Even Better Sechelt
Citizens for Smart Governance
Coalition of Child Care Advocates of B.C.
Committee for Citizen Engagement
Communities Care
Comox Valley Network - Association of Registered Nurses of BC
Concerned Citizens of New Westminster
Concerned Citizens of Qualicum Beach
Coquitlam Firefighters Local 1782
Coquitlam Teachers' Association*
Cowichan District Teachers' Association*
Cowichan Taxbusters
Cowichan Valley District Parents Advisory Council
Creston Valley Teachers' Association*
Delta Teachers' Association*
District of North Vancouver Fire Fighters IAFF Local 1183
Dogwood Initiative
Downtown and West End Residents Association
Environmental Survey Committee
Esquimalt Fire Fighters Association
Force of Nature Society
ForKelowna

Appendix II – Third Party Advertisers (continued)

Foundation for Better Government
Fraser Valley Labour Council
Friends of Maple Pool
Friends of the Trail Public Library
Friends of Urban Agriculture in Lantzville-Society
Futurevest Investments Corporation
Galiano Health Care Society
Georgia Strait Alliance
Gibsons Alliance of Business and Community
Gibsons Gold
Greater Victoria Teachers' Association*
Health Sciences Association of British Columbia
Hospital Employees' Union
Independent Contractors and Businesses Association of BC
International Association of Machinists and Aerospace Workers
Kamloops & District Labour Council
Kamloops Thompson Teachers' Association*
Kelowna Professional Firefighters Association
KGHM Ajax
Kitimat District Teachers' Association*
Klaus Fuerniss Enterprises Inc.
Kootenay Conservation Program
Langley Teachers' Association*
Langley Township Unelection Campaign
Lavington LIFE
LeadNow Society
Maple Ridge Teachers' Association*
Melinda Slater & Scenery Slater
Metro Vancouver Alliance
Mission Downtown Business Association
My Sea to Sky
Nanaimo District Teachers' Association*
Nanaimo Ratepayers Association
Neighbourhoods for a Sustainable Vancouver
New Westminster & District Labour Council
New Westminster Constituency Association BC NDP
New Westminster Environmental Partners
NextUse Recycling Ltd.
North Central Labour Council
North Saanich Community Voices
Okanagan Mainline Real Estate Board
Oliver Community Theatre Society
One Cowichan Community Education Society
Open Victoria Initiative Society
Parents For Public Education New Westminster
Peace River North Teachers' Association*

Appendix II – Third Party Advertisers (continued)

Pender Island Vacation Accommodations Association
Port Moody Firefighters Association
Powell River Friends of the Library Society
Powell River Literacy Advisory Council
Powell River Public Library Board of Trustees
Powell River Voices Society
Progressive Nanaimo
Propeller Strategy Society
Protect Our Park
Public Service Alliance of Canada BC Region
Richmond Firefighters Association IAFF Local 1286
Save Cedar Schools
SaveNorthSaanich.ca
Sea to Sky Teachers' Association*
Sensible Change Society
Silverado Group of Companies
SmartCentres
Stop the Docks
Surrey Fire Fighters Association Local 1271 PAC
Surrey Teachers' Association*
Sustainable Squamish
The Capital Region Amalgamation Society
The Pro-Amalgamation Party Association
The WaterWealth Project Society
Township of Langley Professional Firefighters IAFF Local 4550
Trillium Medical Education Consultants Inc.
Unifor Local 2301
UVic Greens
Vancouver and District Labour Council
Vancouver Elementary School Teachers' Association*
Vancouver Fire Fighters' Union Local 18
Vancouver Secondary Teachers' Association*
Victoria Labour Council
Victoria Vision
Vote for Change
Voters Taking Action on Climate Change
Watershed Watch Salmon Society
West Vancouver Citizens for Good Government
Willoughby Neighbours
Women Transforming Cities International Society
Woodfibre LNG Limited
Young Voters - Sunshine Coast

Consultation Feedback Bill 43, <i>Local Elections Campaign Financing (Expense Limits) Amendment Act</i>			
How Received	Community	Affiliation	Concern
Website	Did not identify	Did not identify	<ul style="list-style-type: none"> Does not want businesses or unions to be able to fund local/municipal candidates.
Website	Did not identify	Did not identify	<ul style="list-style-type: none"> Wants a donation cap of \$5,000, for individuals and corporations, per election. Would like full disclosure of contributions during the election process (who has contributed how much and to whom).
Website	North Vancouver City	Did not identify	<ul style="list-style-type: none"> Would like to see contribution limits. Would like to see spending limits passed on a per capita model.
Website	North Saanich	Electoral Organization	<ul style="list-style-type: none"> Agrees with almost all aspects of the proposed reform except the "proposed expense limits period". Believes it is not appropriate that the expense limit period of a third party advertiser be limited to only 28 days. The expense period should be the same for candidates and third party advertisers -from January 1st in the year of the election.
Website	Delta	Electoral Organization: Financial Agent	<ul style="list-style-type: none"> Questions whether "campaign financing arrangements" will allow for shared donations and expenses as has been done in the past. The legislation seems to be designed for larger cities with slates of candidates operating very large budgets and able to afford paid officials to help guide them through the process. Identify the risk that in small communities volunteers and/or the candidates act as financial agents. Is concerned that the financial reporting rules are so daunting they may discourage potential participants.
Website	Gibsons	Previously ran as a candidate.	<ul style="list-style-type: none"> Wants to see donation sources and amounts posted <i>during</i> the election period. Wants to see greater transparency so voters know who is backing the candidates.
Website	Did not identify (But references the City of Vancouver)	Third Party Advertiser? "Engaged Citizens"	<ul style="list-style-type: none"> Does not believe there should be a limit to the amount of his "own personal money" he wishes to spend on his campaign.

Website	North Saanich	Third Party Advertiser	<ul style="list-style-type: none"> • Imposing a 5% limitation on a third-party advertiser limits participation. • In North Saanich \$540 would not cover the duplication and delivery costs of a single-sheet mailbox statement. • The local newspaper is already beyond the budget of their community-based neighbourhood group.
Website	City of Vancouver	City Clerk	<ul style="list-style-type: none"> • Expense Limits are fairly aligned with other jurisdictions. • Would like to see contribution limits. • Concerned that EQs will circumvent the expense limit requirement by using contributions which exceed the expenditure limits to "campaign through the courts" and continue to campaign for issues outside the election period. • Would like to see clear allocation rules for expenditures which relate to campaigns both for Vancouver School Board (over the University Endowment Lands and Vancouver election areas) and for Council and Park Board (Vancouver election area only). • Believes that the proposed scheme is overly complicated for elector organizations.
Website (Hard copy to follow)	Vancouver	"City Hall Watch" Petition	<ul style="list-style-type: none"> • Prohibit donations to municipal political parties or candidates from corporations and unions; • Permit only Canadian citizens or permanent residents to contribute; • Place appropriate limits on personal donations and require continuous and transparent • Disclosure of donations above a modest threshold; • Place appropriate limits on campaign spending; and • Establish clear and enforceable regulations to prevent funneling of donations through third parties or other circumventions of these reforms.
Website	Did not identify	Has previously run a campaign in local elections.	<ul style="list-style-type: none"> • References the Ontario model for campaign contributions. • Would like contribution limits put in place. • Believes that the new rules do not level the playing field in large cities and that those who run as part of a slate/party have an advantage over independents in the new system.

Website	Vancouver	Elector Organization: Vancouver Non-Partisan Association (NPA)	<ul style="list-style-type: none"> • Would like to see the per capita spending amounts reduced for categories over the 150,000 mark to help reduce election spending in Vancouver and other large municipal jurisdictions. • Suggested considering the addition of a population category "break point" at the 500,000 per capita point to lower the spending limit (i.e., set a per capita population category amount from 250,000 to 500,000 and a lesser amount thereafter). • Suggested a lower per capita amount be considered for population categories over the 150,000 point. • Indicated that a Vancouver-specific expense limit is <i>not</i> required. • Believe that the expense limit period should be the same for elector organizations, candidates, third party organizations and advertising sponsors. • Concerned that the proposed expense limit period for third party advertisers will only apply during the 28 days prior to Election Day; whereas elector organizations and candidates will be subject to an expense limit period that is nearly a year long. • The NPA believes that the proposed expense limits for third-party advertisers are appropriate (but references larger communities). • Would like to see a requirement for financial and services disclosure by elector organization in non-election years. • Would like a ban on union and corporate donations. • Would also like to have tax receipt status for elector organizations equivalent to that which already exists for parties at the provincial and federal government levels. • Would like to see contribution limits. • Would like to see a ban on cash donations. • Rules should be implemented that compel candidates and organizations to provide their disclosure statements in standard data formats that are easy to analyze and use. • Believes that Elections BC, not local governments, should be responsible for
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			<p>overseeing the reporting and compliance of the <i>Local Government Act</i> and the <i>Local Elections Campaign Financing Act</i>, as well as housing and publishing the centralized donors list of all parties and individuals.</p> <ul style="list-style-type: none"> • Would like to see the <i>Elections Act of BC</i>, the <i>Local Government Act</i>, the <i>Local Elections Campaign Financing Act</i>, and any other relevant legislation, standardized and harmonized on an ongoing basis, with civic electoral finance legislation and other relevant provisions mirroring provincial legislation. This would provide consistency of process, clarity of rules, and a clear understanding of the penalties for non-compliance. It would streamline the process for communicating with and training political organizations and candidates, especially given that many candidates and campaigners are active at multiple levels of politics.
Website	Delta South	MLA Vicki Huntington	<ul style="list-style-type: none"> • Ban corporate and union donations from local and provincial elections. • Notes that Alberta, Quebec, Manitoba, Nova Scotia and the federal government have all banned corporate and union donations.
Website	Richmond	EO: Richmond First Voters Society	<ul style="list-style-type: none"> • Would like to see donations to civic candidates be tax write-offs.
Website	Delta	Financial Agent for Elector Organization and for a provincial candidate.	<ul style="list-style-type: none"> • Feels campaign financing arrangements are redundant and that candidates running under an EO should be required to have all their spending done by the EO. • Identified allocating expenses per candidate within an Elector Organization as problematic. How to divide cost? How will Elections BC to monitor it? • The independent candidate is at a disadvantage compared to the candidate associated with an Elector Organization.

			<ul style="list-style-type: none"> ○ Economies of scale (less cost for signage and greater coverage). ○ Structure in place (the EO will have financial agents and people to manage the details of the campaign that an independent will have a harder time acquiring – if at all). • Keeping financial records from January 1st is problematic as first time candidates often do not make the decision to run until mid summer. This is especially true in smaller communities. Bank accounts haven't been established. Financial Agents appointed. First time Financial Agents are also at a disadvantage.
Website	Lower Mainland	Elector Organization: The Coalition of Progressive Electors	<ul style="list-style-type: none"> • In favour of contribution limits. • Feels that expense limits are too high. • Concerned that calculating expense limits will be cumbersome – particularly for smaller organizations that do not have access to in-house staff who can handle the financial and administrative elements. • Would like to see a separate formula for EOs. • Would like to see independent candidates have a "top-off" amount to adjust for the non-existence of an organizational backer. • Would like the TPA limit to be extended to 60 days.
Website	Province wide	Third Party Advertiser: Canadian Union of Public Employees BC (CUPE BC)	<ul style="list-style-type: none"> • Agree with application of expense limits for Third Party Advertisers (TPAs) to the 28 day campaign period. • Concerned that TPA amount is too low in communities with populations less than 10,000. • Restated their position that expense limits for TPAs should NOT apply to assent voting as assent voting is different than electing public officials, and campaigns promoting or opposing assent questions are different in nature from an election campaign.
Website	Province wide	Third Party Advertiser: BC Government and Service Employees Union (BCGEU)	<ul style="list-style-type: none"> • Agree with application of expense limits for Third Party Advertisers (TPAs) to the 28 day campaign period. • Agree with the \$150,000 provincial expense limit for TPAs. • Concerned that the proposed limit for TPAs within smaller communities is too low. Feel that there are certain costs that are common to many Third Party Campaigns regardless of the

			<p>size of community (graphic design, printing, postage) and the expense limits should reflect this reality.</p> <ul style="list-style-type: none"> • Feel that the low expense limit will be a barrier to meaningful participation of TPAs. • Propose the limit be increased to fifteen percent of what a mayoral candidate is permitted to spend.
Website	Vancouver	Did not identify	<ul style="list-style-type: none"> • In favour of Contribution limits. • Only allow individual residents to make contributions (ban corporate and union donations). • Require Elector Organizations to file annual disclosure forms as money raised between elections and the lack of disclosure is not healthy for democracy. • Allow Vancouver to set lower spending limits by amending the <i>Vancouver Charter</i> to allow Council to lower spending limits by bylaw. • Change the term of office back to three years. • Elector Organizations have economies of scale and candidates have an advantage being part of a slate. The last independent candidate to be elected to Council was in 1988. Would like to see EOs have campaign spending limits. • Expense limit threshold for Vancouver is too high. Suggests that the spending limits should be per registered voter and not per resident. • Doesn't see expense limits as getting big money out of Vancouver. Would like to see further caps on EO spending or a ban on elector organizations (as is done in Ontario). • The spending limits should be in place for the entire calendar year that an election takes place in – including after the date of the election as some expenses might be settled after the election. • The proposed reporting rules make it harder for candidates and elector organizations to run in elections. The goal should be to make it easier for people to seek office. • Believe that large urban centres should have a minimum requirement of 100 signatures on a nomination form. • TPAs should not be able to spend more than five percent of the expense limit of a mayoral or other candidate.

			<ul style="list-style-type: none"> • The \$150,000 overarching cumulative limit for TPAs should not be permitted. • The campaign period for TPA should also start at the beginning of the calendar year (Jan 1) • Corporations and Unions should not be able to donate to TPAs. • Consideration should be given to a separate formula for assent campaigns. • Do not allow the exemption of municipalities, governments, and government-controlled organizations from the rules for Third Party Advertisers. • And government organized vote should be subject to spending limits, including ones such as a non-binding plebiscite. The transit plebiscite is an example of one vote that should be covered by spending limits.
Website	Vancouver	Elector Organization: Green Party of Vancouver	<ul style="list-style-type: none"> • Support the introduction of expense limits but feel they are too high. • Agree that EOs should share their expense limits with their candidates thereby not giving endorsed candidates an unfair advantage. • Agree that expense limits should apply from January 1st. • Want to see contribution limits as per Elections Canada's regulations. • Identified expense categories and reporting as challenging if one does not have a professional accountant to assist.
Website	Vancouver	Elector Organization: Board of Directors - Green Party of Vancouver	<ul style="list-style-type: none"> • The expense limits amounts in large cities are too high and support the continued domination by elector organizations. • Lack of reporting and controls on contributions to and spending by elector organizations between election years. Without disclosure EOs can spend more than they raised and pay off the debt in the non-election years via contributions and they have no obligation to report. • Absence of contribution limits is a major disappointment.
Website	Province Wide	BC School Trustee Association	<ul style="list-style-type: none"> • Against having different expense timelines for candidates and third party advertisers.
Email to Minister Fassbender and Parliamentary	Province Wide	Union of BC Municipalities	<ul style="list-style-type: none"> • Supports higher expense limits for mayors, a formula that is sensitive to different-sized communities, expense limits that are applied to third parties and limits that will be adjusted,

Secretary Reimer			<p>based on inflation.</p> <ul style="list-style-type: none"> Concerned about the January 1st date to all campaign spending by candidates but not third parties. Received only one response to their call for feedback and that was from a councillor in a community under 10,000 who felt that having expense limits for smaller communities was not necessary and expressed concern about the amount of paperwork involved for so little dollars, if any. Echo concerns expressed by many small communities about the amount of paperwork that candidates are required to complete. Concerned that excessive paperwork and reporting may become a deterrent to candidates running.
Letter to Minister Fassbender	City of Richmond	Mayor	<ul style="list-style-type: none"> Concerns that a candidate running independently would be significantly disadvantaged in terms of disposable resources when compared to a candidate who is running as part of a slate of candidates with an elector organization due to economies of scale. Is also concerned that the <i>Local Government Act</i> still allows the elector organization to retain between elections surplus campaign funds from its endorsed candidates. Under the legislation, the independent candidate must turn any surplus over to the city to be held in trust.
Email to Minister Fassbender	Did not identify	Did not identify	<ul style="list-style-type: none"> Would like to see contribution limits on donations from unions, corporations, or affluent individuals. Would also like to see limits on provincial candidates as well.
Letter to Minister Fassbender	City of Vancouver	From Mayor Gregor Robertson	<ul style="list-style-type: none"> Wants to see restrictions on contributions.
Email to Minister Fassbender	West Vancouver	Did not identify	<ul style="list-style-type: none"> Would like to see contribution limits put in place. Would also like to see limits on provincial candidates as well. Make it transparent who donors are before elections and in non-election years.
Email to Minister Fassbender	Did not identify	Did not identify	<ul style="list-style-type: none"> Would like to have a lower cap for EOs running a full slate of candidates. Union and corporate donations should be banned.

			<ul style="list-style-type: none"> • Reasonable cap on individual donations.
Email to Minister Fassbender	Did not identify	Did not identify	<ul style="list-style-type: none"> • Would like to see contribution limits on donations from unions, corporations, or affluent individuals – possibly a ban.

Page 058 to/à Page 061

Withheld pursuant to/removed as

s.3

Robertson, Tatiana CSCD:EX

From: Minister, CSCD CSCD:EX
Subject: FW: Campaign Donation Limits

From: Fassbender.MLA, Peter [mailto:Peter.Fassbender.MLA@leg.bc.ca]
Sent: Tuesday, October 27, 2015 10:02 AM
To: Minister, CSCD CSCD:EX
Subject: FW: Campaign Donation Limits

From: s.22
Sent: October 26, 2015 4:05 PM
To: Fassbender.MLA, Peter <Peter.Fassbender.MLA@leg.bc.ca>
Subject: Campaign Donation Limits

I doubt you will get to read as it will probably be deleted like all e-mails, however it is worth trying. If you are quoted correctly in the Globe Oct. 23, 2015 you say you "believe in Democracy And people's right to be engaged" Then you say "limiting campaign donations will effect peoples free speech and 'democracy' How can you possible related Campaign Donations to Democracy, or free speech .For Democracy to be effective it must always be "one Person one Vote" regardless of economic circumstance. Just because a Rich person or a Corporation, or A Union makes big Donations does not make them any more Democratic and have a greater right to Free Speech, than the majority of us who are the life blood and backbone of our Society And who Vote.
 Thank you s.22

Stewart, D'Arcy CSCD:EX

From: s.22
Sent: Tuesday, October 27, 2015 4:13 PM
To: Local Government Election Reform CSCD:EX
Subject: Comment on the new legislation

Dear Minister

My concern is not so much with the limits on campaign spending, nor necessarily the source/amounts of donations. Third party spending is enormously influential, and is a way around any spending limits placed on candidates. This is a concern for me. s.22 third party advertising from wealthy pro-development factions was daunting; and a lot of time was wasted "watchdogging" third party advertisers who tried to push the boundaries and bend the rules.

My main concern, however, is that, whatever limits there may or may not be, donation sources and amounts — as well as third party spending — should be posted DURING the election period, NOT afterward! For many people, the issue of who gives what or how much to whom is a critical factor in deciding for whom they will vote. Providing this info only after the election is rather like closing the proverbial barn door after the horse has bolted. In the interests of TRANSPARENCY, the amounts and sources of all campaign contributions and third party spending must be PUBLIC, at least throughout the election period.

Thank you for the opportunity to comment. If it is more appropriate that I comment by regular mail, rather than email, please advise and I will do so.

With respect,

s.22



City of
Richmond

Malcolm D. Brodie
Mayor

6911 No. 3 Road,
Richmond, BC V6Y 2C1
Telephone: 604-276-4123
Fax No: 604-276-4332

October 30, 2015

Hon. Peter Fassbender
Minister of Community, Sport and Cultural Development and
Minister Responsible for Translink
PO Box 9058, Stn Prov Govt
Victoria, BC
V8W 9E2

MINISTRY OF COMMUNITY
SPORT AND CULTURAL DEVELOPMENT
MINISTER'S OFFICE

RECEIVED

NOV 12 2015

ROUTE TO:

CC:

DRAFT REPLY ☒ DM ☐ FY/FILE ☐
REPLY DIRECT ☐ FNA ☐

Dear Minister Fassbender:

Thank you for providing an opportunity for comment on the Local Government Elections – Expense Limits Legislation, Bill 43.

I note that the principles that form the basis for the proposed election expense limits include the principles of fairness and neutrality. The principle of neutrality mandates that expense limits should not be an incentive or disincentive for a candidate choosing whether to run as part of a slate with an elector organization or run independently. The rules must also be fair to all.

However, under the new rules, a candidate running independently would be significantly disadvantaged in terms of disposable resources when compared to a candidate who is running as part of a slate of candidates with an elector organization. For instance, an independent candidate running for mayor would have to separately open, equip and staff a campaign office, purchase signs, buy advertising space, etc. The candidate running with an elector organization's slate would only have to contribute towards a portion of those same or marginally higher costs that are borne by an entire slate. These economies of scale and the pooling of resources would create a distinct advantage for the person running with an elector organization slate as compared to the independent candidate who must bear all of these basic expenses within a single expense limit.

To add to this advantage, the Local Government Act still allows the elector organization to retain between elections surplus campaign funds from its endorsed candidates. Under the legislation, the independent candidate must turn any surplus over to the city to be held in trust and thus, those surplus funds are unavailable to the candidate until the following election. Candidates running with elector organizations have the advantage of continually gaining access to their surplus funds through their elector organization and thus finance activities for the whole period between elections.

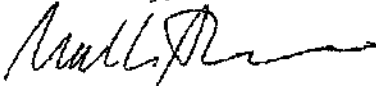
 Richmond

To better address this unfortunate unfairness and lack of neutrality, I suggest:

1. Give the independent candidate a higher spending limit than a candidate running as part of an elector organization's slate;
2. Remove the rule that the independent candidate must turn over surplus funds to the city following an election and thus allow the candidate access to those funds.

I would be pleased to discuss this matter further at your convenience.

Yours truly,



Malcolm D. Brodie
Mayor



Mayor Gregor Robertson
 Le maire Gregor Robertson
 羅品信市長
 गवेरास रोडरटसन, मेयर
 Punong-bayan Gregor Robertson

ni? et xatamatal, ta t'niinat, ta tomax? ni? ta k'axk'a? | °
 We watch over the land and sea and in turn they watch over us.

November 3, 2015

Honourable Minister Peter Fassbender
 Minister of Community, Sport and Cultural Development
 Minister Responsible for TransLink
 Parliament Buildings
 Victoria, BC
 V8V 1X4

Dear Minister Fassbender,

I am writing to you following a recent announcement by the Ministry of Community, Sport and Cultural Development regarding legislation to reform campaign expense limits for local government elections.

Vancouver City Council is very supportive of campaign finance reform for local elections, and has made repeated calls to the province over the past 10 years. However, recently introduced legislation falls far short of what is needed.

In recent years, spending during municipal elections has grown substantially. In 2011, we saw one donor contribute close to \$1 million to a single electoral organization. There is nothing in your current legislation that will prevent this from occurring in the future. It is particularly important to note that the newly proposed framework for spending limits will have minimal impact for larger cities such as Vancouver, given the number of candidates who can seek office for City Council, Park Board and School Board.

Stronger reforms are needed to bring balance to civic campaigns and ensure they are accessible for all candidates. I urge the Province to bring in limits on financial contributions from individuals, enact a ban on donations from corporations and unions, and to provide for greater disclosure during civic election campaigns. These actions are necessary to create a fully democratic electoral process, and their implementation will ensure true fairness, transparency, and accountability in civic elections.

Thank you for considering these recommendations for municipal campaign finance reform.

Sincerely,

Gregor Robertson
 Mayor, City of Vancouver

604.873.7621

604.873.7685

gregor.robertson@vancouver.ca

vancouver.ca

Office of the Mayor, City of Vancouver, 453 West 12th Avenue, Vancouver, British Columbia, Canada V5Y 1V4

Stewart, D'Arcy CSCD:EX

From: Engaged Citizens <info@engagedcitizens.ca>
Sent: Thursday, November 5, 2015 10:34 AM
To: Local Government Election Reform CSCD:EX
Subject: Re: Local Government Elections Reform

My question is-- if I run for Mayor of Vancouver, and I want to spend my own personal money on my campaign, will there be any limit on how much I can spend?

I think that I should have the freedom to spend my own money on myself.

s.22

Sent from my BlackBerry 10 smartphone on the Rogers network.

From: Local Government Election Reform CSCD:EX
Sent: Thursday, November 5, 2015 9:53 AM
Subject: Local Government Elections Reform

Please find attached letter from Parliamentary Secretary, Linda Reimer.
Thank you.

Stewart, D'Arcy CSCD:EX

s.22

From:
Sent: Friday, November 6, 2015 8:48 AM
To: Local Government Election Reform CSCD:EX
Subject: Local Elections Campaign Financing Act

Follow Up Flag: Follow up
Flag Status: Completed

I ran an elector organization, "Team North Saanich" in the recent Municipal Election in North Saanich and appreciate the opportunity of providing feedback on the Election Campaign Financing reforms.

I agree with almost all aspects of the proposed reform with the exception of one item, the "proposed expense limits periods".

I believe it is not appropriate that the expense limit period of a third party advertiser be limited to only 28 days, the expense period should be the same for candidates and third party advertisers, from January 1st in the year of the election. The proposed timing would appear to allow a third party advertiser to run a 9 month attack on an incumbent without the incumbent being able to respond without incurring election expense. Why would you give a third party advertiser such an advantage.

In a very polarised municipality such as North Saanich the campaign platforms are well known by January 1st of the year of the election. Third party advertisers very seldom have a positive voice, rather are usually attacking a person or policy. To give them the opportunity to spend unlimited amounts of money right up to 28 days before the election without a candidate or elector organization being able to respond does not have the kind of "fairness " that one expects in election financing.

Thank you again for the opportunity to provide input.

s.22

Stewart, D'Arcy CSCD:EX

From: Save North Saanich <info@savenorthsaanich.ca>
Sent: Saturday, November 14, 2015 3:06 PM
To: Local Government Election Reform CSCD:EX
Subject: Local Elections Campaign Financing (Expense Limits) Amendment Act, 2015

Follow Up Flag: Follow up
Flag Status: Completed

Gentlepeople:

In the instance of North Saanich, imposing the 5% limitation on a third-party advertiser would render it essentially mute.

The \$540 proposed does not cover the duplication and delivery costs of a single-sheet mailbox statement. The local newspaper - a district monopoly - is already beyond our budget. We are a community-based neighbourhood group: How are we to get our message out?

We understand and support careful limitation of campaign financing, but restrictions like this would limit our participation to word of mouth.

Thank you.

Don Enright
for
SaveNorthSaanich.ca

Stewart, D'Arcy CSCD:EX

From: MacKenzie, Janice <janice.mackenzie@vancouver.ca>
Sent: Monday, November 16, 2015 4:43 PM
To: Local Government Election Reform CSCD:EX
Cc: Oehlschlager, Kelly; Connell, Francie; XT;Hagiwara, Rosemary MTIC:IN
Subject: Local Government Election Reform: Expense Limits

Attention: Local Government Election Reform: Expense Limits

On behalf of the City of Vancouver, I am submitting the attached comments for your consideration.

Janice MacKenzie | City Clerk & Chief Election Officer
Office of the City Clerk | City of Vancouver

t. 604-871-6146 janice.mackenzie@vancouver.ca

November 16, 2015

Local Government Election Reform: Expense Limits
Ministry of Community, Sport and Cultural Development
P.O. Box 9847, Station Provincial Government
Victoria, BC V8W 9T2

Re: Local Elections Campaign Financing (Expense Limits) Amendment Act, 2015

On behalf of the City of Vancouver, I respectfully submit the following comments and requests to the Ministry of Community, Sport and Cultural Development with respect to Bill 43, *Local Elections Campaign Financing (Expense Limits) Amendment Act, 2015* (LECFA 2015).

General

The City supports limits on both campaign contributions and campaign expenditures by candidates, elector organizations and third party advertisers. However, the amendments proposed in LECFA 2015 only establish expenditure limits - not contribution limits. Over the course of several years, Vancouver City Council has passed many resolutions in support of both contribution and spending limits. We are deeply concerned that LECFA2015, as proposed, is far too narrow to achieve the core democratic objectives of transparency, accountability, and equity that we all share and, moreover, the proposed changes create an overly complicated regulatory scheme.

Both contributions and expenditures should be limited

A core purpose of LECFA is to limit the use of money to unduly influence elections and local government decision-making. However, LECFA 2015 proposes only to limit campaign expenditures and not limit campaign contributions. Best practices, as identified by the Organization of American States (OAS) and International Institute for Democracy and Electoral Assistance (IDEA), support the implementation of well-defined contribution and not just expenditure limits. The OAS and IDEA further recommend prohibiting contributions from anonymous donors, foreign donors, corporate, and media entities, as well as other legal entities such as unions. It is important that both contributions and expenditures be regulated in order to ensure that the conduct of elections is truly transparent and equitable.

Therefore, the City strongly urges that the proposed LECFA 2015 be revised to include contribution limits including a ban on corporate and union contributions.

Page 1 of 3 pages

Expenditure limits

With respect to the proposed expenditure limits, the City is of the view that the proposed limits are fairly aligned with other jurisdictions. As we have indicated before, we support the material reduction in overall expenditures on local government election campaigns from their current levels in order to better achieve the democratic objectives of this legislation.

Expenditure limits too narrow as to "period" they are in effect

We also acknowledge that the proposed changes will restrict candidate expenditures from January 1st to voting day in an election year, and not simply focus on the much shorter campaign period.

The proposed amendments only limit expenditures during the approximately 10 months prior to general voting day. It is common for electoral organizations to receive contributions in excess of their expenditures. The City has observed that such surplus funds can be used to "campaign through the courts" as well as to continue to campaign for issues outside of this 10-month period. While the City has no concerns with citizens' rights to seek redress through the courts or to advocate for issues and causes, the purpose of this proposed legislation is to level this right as between those with more money and those with less money.

Without contribution limits and, at the least, a continuous annual expenditure limit, there will likely be an increase in advertising and campaign activity outside this proposed 10-month window. Such a result would clearly defeat the core purpose of the proposed legislation.

The City, therefore, requests that the campaign spending limit include an overall expenditure limit on an annual basis - both during election years and in between election years so that expenditures both during and outside the election proceedings period are controlled and the influence of money is limited.

University Endowment Lands

The City has a specific concern about the application of the proposed rules in Vancouver's local government elections. Vancouver is unusual in that the school board elections involve an area that falls outside the City's electoral boundaries - the University Endowment Lands that are otherwise governed by Metro Vancouver.

The City requests that any regulations be drafted to include clear allocation rules for expenditures which relate to campaigns both for Vancouver School Board (over the UEL and Vancouver election areas) and for Council and Park Board (Vancouver election area only).

Overly Complicated

While the City supports the legislative principle that limits should apply equally to both party and independent candidates, the City still has a basic concern that the proposed scheme is overly complicated.

Vancouver's local elections are dominated by elector organizations. It is generally the practice of elector organizations in the City to run a slate of candidates for all offices

available, including the school board. Allocating the cost of a single advertisement that endorses all the elector organization's candidates will be an overly complicated task.

For example, if an advertisement for an entire slate of candidates included the race for one Mayor, 10 Councillors, seven Park Board Commissioners and nine School Board Trustees, the advertisement would apparently be considered a campaign expenditure for all the 27 named candidates. However, this would potentially include four separate types of campaign limits (assuming a separate expenditure limit for each type of office), one of which (school board) would be based on a different population size from the others because the school board election includes an additional area (UEL) outside the City. This single advertisement would also be subject to 27 different Campaign Financing Arrangements.

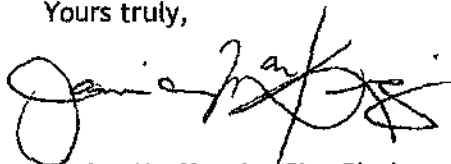
Proposed alternative

As noted, the City requests legislation with both material contribution limits as well as material spending limits.

Our research indicates that a number of provinces have established campaign contribution and spending limits for local elections. As well, the federal government and a number of the provinces have both contribution and expenditure limits. It is the City's opinion that the policy rationale for the City's request is well-founded.

In closing, the City of Vancouver is committed to increasing transparency and accountability concerning election campaign financing. We make the above requests on the basis that they represent sound public policy that advances best practices regarding democratic election principles.

Yours truly,

A handwritten signature in black ink, appearing to read 'Janice MacKenzie', with a large, stylized flourish at the end.

Janice MacKenzie, City Clerk
and Chief Election Officer

Stewart, D'Arcy CSCD:EX

From: Campaigndelta2014 <Campaigndelta2014@telus.net>
Sent: Friday, November 20, 2015 8:54 AM
To: Local Government Election Reform CSCD:EX
Subject: Re: Local Government Elections Reform

Thank you for the information regarding proposed changes to local elections financing rules. I served as financial agent for an electoral organization in the last municipal election and have consulted with 2 of our elected candidates regarding the following feedback to your email.

First, the caps suggested for mayoralty and council candidates seem reasonable. However, we see no mention of caps for school trustee candidates. May we assume their limit would be the same as for council candidates?

In 2014, our electoral organization ran candidates for both council and school board. All money donated to the electoral organization was spent for all four candidates equally. Can you confirm that under the new legislation, an electoral organization would be able to share both donations and expenses as we did in 2014?

I have tried to understand the proposed legislation regarding "campaign financing arrangements". Can you confirm that this arrangement does in fact permit an electoral organization to do as we did in 2014? If not, how would it be different?

Finally, we do not see mention of caps for individual or corporate donations. Where is this information available?

On a personal note: Given that many local elections are run in smaller and mid-sized communities, and given the interest we all have in ensuring that as many people as possible participate in the democratic process, it should be recognized that electoral organizations in such areas likely depend on volunteers to act as financial agents. Individual candidates often act as their own financial agent. Therefore, I would hope to see legislation reflect the reality of campaigning in smaller, volunteer-run campaigns. We all want fair, transparent and properly-funded campaigns. But the legislation seem to be designed for larger cities with slates of candidates operating very large budgets and able to afford paid officials to help guide them through the process.

I am not sure how you reconcile the needs of big-city campaign practices with smaller, volunteer run efforts, but I fear that some who found the financial reporting rules so daunting and frustrating in 2014 have vowed to never become involved again. That's a shame!

Respectfully,

Diane Kirkbride



This email has been sent from a virus-free computer protected by Avast.
www.avast.com

Stewart, D'Arcy CSCD:EX

From: s.22
Sent: Saturday, November 21, 2015 12:19 PM
To: Local Government Election Reform CSCD:EX
Subject: Proposed spending limits on local elections

Please tighten up rules about contributions and spending much more than you are currently proposing.

We need meaningful and tight limits on donations to candidates (in cash and in kind) and spending (in cash and in kind) by unions, corporations and individuals, so that our elections are not decided by those with the deepest pockets. Contributions by individuals should be limited to \$300 per candidate and contributions by unions and corporations (in cash and in kind) should be limited to \$1,500 per candidate, or less. Spending by candidates, even with their own money, should be limited to some small amount per capita... say \$0.50 or \$1.00...I don't know what the right amount is for this, but it should be as small as possible.

It is very clear that municipal elections are more and more being distorted by big money. Public trust and the public interest are being undermined by such spending. It would vastly improve the electoral process and the subsequent governance of our municipalities if elected officials were less beholden to large donors and more in touch with voters.

Door knocking, public debates and such do not have to be very expensive. We should encourage more of those activities.

s.22

Stewart, D'Arcy CSCD:EX

From: Holland, Jodie CSCD:EX
Sent: Tuesday, November 24, 2015 3:49 PM
To: Local Government Election Reform CSCD:EX
Subject: FW: No Limits for campaign donations

From: Fassbender.MLA, Peter [<mailto:Peter.Fassbender.MLA@leg.bc.ca>]
Sent: Wednesday, October 28, 2015 4:27 PM
To: Minister, CSCD CSCD:EX
Subject: FW: No Limits for campaign donations

From: s.22
Sent: October 28, 2015 3:33 PM
To: Fassbender.MLA, Peter <Peter.Fassbender.MLA@leg.bc.ca>
Cc: Sultan.MLA, Ralph <Ralph.Sultan.MLA@leg.bc.ca>
Subject: No Limits for campaign donations

Dear Mr. Fassbender

I am deeply concerned that you are not imposing limits on donations from unions, corporations and affluent individuals. The assertion that it infringes on democratic rights is incorrect and in fact is just the opposite.

As we have seen in many instances corporations, unions and affluent individuals will bias the views of the politicians who receive the donated funds. The US government's elected officials are a prime example of how grossly misused this ability is to spend unlimited funds to affects outcomes. If it didn't work they, the unions, corporations or affluent individuals, wouldn't spend vast sums of money to influence outcomes. Every dollar these groups give represents a disproportion voting right due to their deep pockets (ie. has a serious diluting effect on my and all individuals voting power).

Our municipal leaders need to be listened too and the legislation changed to protect the value of our individual voting rights. As soon as a government implements legislation that does not protect and ensure the importance of an individual's rights it damages our right to have an equal voice and democracy is damaged.

A major re think is required for this piece of proposed legislation and ensure the limits on political donations include the provincial government.

s.22

Stewart, D'Arcy CSCD:EX

From: CityHallWatch (MetroVanWatch) <citizenyvr@gmail.com>
Sent: Thursday, November 26, 2015 3:59 PM
To: Local Government Election Reform CSCD:EX
Subject: Written comments: Local Government Election Reform: Expense Limits (Deadline Nov 27)

Please note that this is an electronic version of documents sent by courier, to arrive on or before Nov 27.

25 November 2015
Local Government Election Reform: Expense Limits
Ministry of Community, Sport and Cultural Development
P.O. Box 9847 Stn Prov Govt, Victoria, BC V8W 9T2

Re: "Petition for Municipal Election Campaign Finance Reform" as public input on "Local Government Election Reform: Expense Limits"

Dear Sir / Madame:

Please put this petition on record as public input on reforms of local government campaign finance rules.

The text of the petition is as follows:

"Get Big Money out of Civic Politics!" Petition for Municipal Election Campaign Finance Reform
We, the undersigned residents and voters of British Columbia, petition the Government of British Columbia to help combat actual and potential conflicts of interest in civic governance by acting promptly to:

- 1. prohibit donations to municipal political parties or candidates from corporations and unions;*
- 2. permit only Canadian citizens or permanent residents to contribute;*
- 3. place appropriate limits on personal donations and require continuous and transparent disclosure of donations above a modest threshold;*
- 4. place appropriate limits on campaign spending; and*
- 5. establish clear and enforceable regulations to prevent funneling of donations through third parties or other circumventions of these reforms.*

We submitted signatures on October 22, 2013 as public input on the "White Paper on Local Government Elections Reform" (paper petition signed by 635 individuals May 2013 – Oct 22, 2013). We also submitted 154 names from an online version of this petition supporting the same five points.

Attached are signatures of an additional 87 individuals who support the "Get Big Money out of Civic Politics!" petition, bringing the total to 722 signatures. As well, the names of an additional 43 individuals from an online version of this petition are included, bringing the online total to 197. The signatory address is in Vancouver unless otherwise indicated. Signatories provided their information to us in confidence, for the sole purpose of this petition. Names and addresses are only for verification by the Province. Phone numbers and e-mail addresses are not to be entered into a database or used for any purpose other than verification.

Through communications with concerned individuals and civic groups we know many believe large financial contributions have an excessive influence on civic governments and want the Provincial Government to institute significant improvements in rules for the October 2018 civic elections. Thank you for opportunity to provide public input.

Sincerely,
Randy Helten
President, CityHallWatch Media Foundation
#307-1208 Bidwell St. Vancouver, BC. V6G 2K9

Attached:
CityHallWatch BC-LGER-EL input, COVER LETTER 25-Nov-2015.pdf
CityHallWatch BC-LGER-EL input, PAPER signatures scan 25-Nov-2015.pdf
CityHallWatch BC-LGER-EL input, ONLINE signatures 25-Nov-2015.pdf
CityHallWatch iPetition text Get Big Money out of BC Civic Politics, 25-Nov-2015.pdf

citizenYVR@gmail.com

CityHallWatch.ca. *Tools for engagement in Vancouver City decisions. Creating our future.*

MetroVanWatch.ca. *Our dream: A socially, environmentally, agriculturally sustainable Metro Vancouver region.*

BC Election Campaign Finance Reform Network: *Get the big money out of civic and provincial politics.*

25 November 2015

Local Government Election Reform: Expense Limits
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Sincerely,

Randy Helten
President, CityHallWatch Media Foundation
CityHallWatch.ca provides tools for citizens in Vancouver to better understand and engage City Hall.

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Name (print)	Address	City	Email or Phone # (Optional)	Signature	Date
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Please return completed pages to CityHallWatch. Privacy: We respect your privacy and we will not trade your name or allow it to be used by third parties.

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This petition has collected
220 signatures
using the online tools at ipetitions.com

Printed on 2015-11-25

Get Big Money out of BC Civic Politics! Reform Municipal Election Campaign Finance

About this petition

"Get Big Money out of Civic Politics!" Petition for Municipal Election Campaign Finance Reform We, the undersigned residents and voters of Vancouver (of British Columbia, for province-wide version), petition the Government of British Columbia to help combat actual and potential conflicts of interest in civic governance by acting promptly to: 1. prohibit donations to municipal political parties or candidates from corporations and unions; 2. permit only Canadian citizens or permanent residents to contribute; 3. place appropriate limits on personal donations and require continuous and transparent disclosure of donations above a modest threshold; 4. place appropriate limits on campaign spending; and 5. establish clear and enforceable regulations to prevent 'tunneling' of donations through third parties or other circumventions of these reforms.

Page 1 of 30

Page 2 of 30

Signatures

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Stewart, D'Arcy CSCD:EX

From: Anita Romaniuk <s.22>
Sent: Friday, November 27, 2015 2:25 PM
To: Local Government Election Reform CSCD:EX
Subject: Local Government Election Reform Expense Limits Response from COPE

As attached.

TO: Ministry of Community, Sport and Cultural Development

November 26, 2015

P.O. Box 9847 Stn Prov Govt

Victoria, BC V8W 9T2

localgovelectionreform@gov.bc.ca

RE: Local Government Election Reform: Expense Limits

FROM: The Coalition of Progressive Electors

#211A-175 East Broadway

Vancouver BC V5T 1W2

Phone: 604-255-0400

NOTE: COPE consents to allow the Ministry of Community, Sport, and Cultural Development, as of the date this email is received, to publish all or part of this submission.

This is COPE's response to the proposed legislation on Local Government Electoral Reform Financing. We regret that this legislation does not impose limits on donations, because this allows donors who have deep pockets to contribute significant amounts which could unduly influence decision-making by elected municipal officials.

The proposed legislation relies solely on Expense limits to curb the escalation of municipal election spending which has occurred since 2000, especially in the City of Vancouver, which has tipped the scales in favour of large and well-funded electoral organizations and their candidates. Unfortunately, the proposed Expense limits that are based on per capita and the number of candidates is too high to ameliorate this effect. If an electoral organization in Vancouver ran a full slate of 10 Councillors, 9 School Trustees, 7 Parks Commissioners, plus a candidate for Mayor, they would be entitled to spend \$2,977,808, which is not much less than what was spent by the two largest electoral organizations in Vancouver, and which still gives these organizations and their candidates a significant advantage.

COPE is concerned that the proposed method of calculating the Expense limit for an Electoral Organization will prove too cumbersome, particularly for smaller organizations that do not have access to in-house staff who can handle the financial and administrative implications, as well as organizations that potentially have a slate of candidates with more than one financial agent. Instead of allocating an agreed-to portion of the Expenses allowed per candidate to the organization, it would be easier to

establish a separate formula for the Electoral Organization. In the case of independents, their limits could be allocated a "top-off" amount to adjust for the non-existence of an organizational backer.

Finally, on the issue of third-party expense limits, COPE would prefer that the election period be adjusted from 28 days to a longer period such as 60 days. If the election is moved to the third Saturday in October, we would likely experience an onslaught of third-party advertising in the weeks prior to the 28-day cutoff, particularly in the first 3 weeks of September when the summer holiday period is over.

Thank you for your consideration.

Connie Hubbs

Co-Chair, Coalition of Progressive Electors

Anita Romaniuk

Member at Large, Coalition of
Progressive Electors, and former
candidate, COPE

Stewart, D'Arcy CSCD:EX

From: s.22
Sent: Thursday, November 26, 2015 3:46 PM
To: Local Government Election Reform CSCD:EX
Subject: Election Reform

I would like to register my comments on the proposed legislation that will impact expense spending for local governments. I am happy to see that there are expense limits that will be imposed however, they do not go far enough. There needs to be a limit placed on any one single donor be it a corporation or individual of no more than \$5,000.00 per election. This would ensure that no one person or entity could have direct access to elected officials based on their donations to campaign funding. Also, it should be considered that this cap applies to all "events" such as dinners, receptions, etc. that people/companies put their names as sponsors. Lastly, there must be full disclosure during the election process of who has contributed what funds to each candidate. Full transparency is the foundation of our democracy and there is no justification to hide donations.

Thank you for listening.

best regards,

s.22

Stewart, D'Arcy CSCD:EX

From: s.22
Sent: Thursday, November 26, 2015 8:52 PM
To: Local Government Election Reform CSCD:EX
Subject: Bill 43

Dear Ministry of Community, Sport and Cultural Development,

My name is s.22 I am writing to you today in regards to Bill 43, the Local Elections Campaign Financing (Expense Limits) Amendment Act, 2015. I have a few concerns regarding this Bill as I have experience running a campaign in local elections.

s.22

s.22

As you are probably aware,

Ontario does not have any party system for municipal councils. All candidates are independent and must fund raise and do not share campaign expenses.

After reading the bill and looking at current practices, I must say that it seems underwhelming. The scope of the bill is expense limits when it should be broadened to contribution limits as well. Ontario has a great model for campaign contributions that I encourage you to look into. Local governments should not be in the pockets of developers, this produces poor acting civic leaders who are supposed to be at the forefront of all citizen's concerns.

I find myself asking the question, if an independent ran in a big city like Vancouver, Richmond, Victoria, ect., does this level the playing field or do parties have an advantage? In terms of the proposed expense limits, there seems to be more than is needed. This proposed limit scheme still favours parties over independents.

In short, I believe that the limits proposed need to be a little more limiting. I do not want to say Ontario has the right scheme, but they are on the right path. Electoral finances should not discourage citizens to run for office. By having large spending limits, you are doing just that.

Sincerely,

s.22

Stewart, D'Arcy CSCD:EX

From: Riecken, Katie <Katie.Riecken@bcgeu.ca>
Sent: Friday, November 27, 2015 3:42 PM
To: Local Government Election Reform CSCD:EX
Subject: BCGEU Submission on Local Government Election Reform: Expense Limits

Hi there,

I have attached the BCGEU's submission as a PDF file. Please let me know if you have any difficulties opening the attachment.

Thanks,
Katie Riecken
BCGEU



B.C. Government and Service Employees' Union

A union reformer in B.C.

November 27, 2015

localgovelectionreform@gov.bc.ca

Local Government Election Reform: Expense Limits
Ministry of Community, Sport and Cultural Development
P.O. Box 9847 Stn Prov Govt
Victoria, BC V8W 9T2

Re Local Government Election Reform: Expense Limits

Thank you for the opportunity to provide feedback on Bill 43, the *Local Elections Campaign Financing (Expense Limits) Amendment Act*.

The BCGEU normally participates in local government elections in BC, and during the 2014 local government elections we were registered as a third party. For this reason, while we are happy to see expense limits for candidates, we will focus our submission on the expense limit periods and expense limits for third party advertisers.

We agree that there should be both a provincial expense limit and an expense limit for advertising within a community, and that these limits should apply during the twenty-eight day campaign period. We also agree that the provincial expense limit of \$150,000 for a third party advertiser is an appropriate limit.

We are concerned, however, that the proposed limits for third party expenses within a community are too low. For example, in a community of 10,000 or fewer residents the third party expense limit would be only \$500. A group could easily exceed this limit by designing and printing a few hundred leaflets. We feel that there are certain costs that are common to many third party campaigns regardless of the size of the community (e.g. graphic design, printing, postage) and the expense limits should reflect this reality.

If the limit for third party expenses remains at five percent of the expense limit for a mayoral candidate, our concern is that third party groups will be limited in their ability to participate meaningfully in local government elections. **We would propose instead that limit be increased to fifteen percent of what a mayoral candidate is permitted to spend.** This would result in a third party in a community of 10,000 residents being permitted to spend up to \$1,500, an amount that we feel would permit them to pay for common campaign costs while still ensuring that their expenses are modest in comparison to what candidates may spend.

Thank you for your consideration.

A handwritten signature in black ink that reads "Stephanie Smith".

Stephanie Smith, President

SS/scm/moveUp

Stewart, D'Arcy CSCD:EX

From: Shirley Loftus <sloftus@cupe.bc.ca>
Sent: Friday, November 27, 2015 3:14 PM
To: Local Government Election Reform CSCD:EX
Subject: CUPE BC Submission

Attached please find a letter from Paul Faoro, Secretary-Treasurer, CUPE BC Division.

Shirley Loftus
Reception/Clerk Typist
CUPE BC Division
510 – 4940 Canada Way
Burnaby, BC V5G 4T3
Phone: 604-291-9119
Email: sloftus@cupe.bc.ca

moveup

November 27, 2015

via email: localgovelectionreform@gov.bc.ca

Ministry of Community, Sport and Cultural Development
P.O. Box 9847 Stn Prov Govt
Victoria, BC V8W 9T2

Thank you for the opportunity to, once again, provide input on the matter of local government elections and specifically the question of expense limits for candidates and third parties in these elections.

We have reviewed the *Local Elections Campaign Financing (Expense Limits) Amendment Act* (Bill 43), as well as the numerous submissions we have made on this and related matters since 2010. We have also reviewed the original report of the Local Government Elections Task Force, and the reports issued by the Special Committee on Local Elections Expense Limits.

We will be limiting our comments to the aspects of Bill 43 that apply to third party advertisers.

First, we appreciate and agree with the application of these expense limits for third parties to the specific 28-day campaign period. We understand there is some concern being expressed in other quarters about this period being shorter for third parties than for candidates, but we think their concerns are mis-guided.

In our opinion, third party advertising in relation to election campaigns would only be effective once the candidates and their positions are known, hence the 28-day campaign period is logical. As well the very low limits imposed on third parties, at 5 percent of what a candidate may spend, will ensure that any third party advertising is minimal.

On the specific question of the spending limit being imposed by third parties, we do have some concern that the amount is too low. In communities of less than 10,000 third parties would be restricted to spending \$250 in relation to a council and school board election – which in some communities will not be sufficient to purchase one effective advertisement in a local newspaper.

However, a review of CUPE BC's local election spending in the past ten years indicates we would not likely have exceeded the proposed spending limits. This makes it difficult to argue for a higher amount. The more important factor is that the imposition of spending limits ensures a level playing ground for all third party advertisers.

Finally, we wish to address the matter of third party advertising as it relates to assent voting.

When we met with Parliamentary Secretary Reimer and ministry staff in July, we re-affirmed the concerns outlined in our submission to the legislative committee, namely:

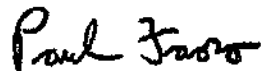
"Whatever expense limits the Committee recommends on third party advertising **must not be applied to assent voting**. Assent voting is different than electing public officials, and campaigns promoting or opposing assent questions are different in nature from an election campaign. One of the key differences is that the jurisdiction sponsoring the assent question is not constrained by Part 3 of the Act.

"Before expense limits are established for third party advertising in relation to assent voting the matter should be fully canvassed, including a fulsome public consultation."

We appreciate that our concerns have been taken into account and third party advertising on assent measures will not be subject to these new spending limits. We trust that any consideration of such a measure will not occur without substantial public consultation.

Thank you again for this opportunity.

Sincerely,



Paul Faoro
Secretary-Treasurer
CUPE BC Division

PF/SL
moveUP
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Stewart, D'Arcy CSCD:EX

From: John Whistler s.22
Sent: Friday, November 27, 2015 8:54 PM
To: Local Government Election Reform CSCD:EX
Subject: Green Party of Vancouver Submission relating to new regulations covering local election expense limits

Please see attached submission.
Thank you for your consideration.

John Whistler

s.22



Special Committee on Local Elections Expense Limits

Submission
November 7 2014

The process

- Elections expenses should be reviewed as part of a complete financing review package - otherwise the pieces of the puzzle do not fit
- Unfortunate timing
 - Before, instead of after the election – Without testing the new regulations
 - 1 week before an election
 - Only two weeks notice
- Best practices review.
 - Federal regulations are one example

Define the objectives

- Strengthen democracy
- Maximize voter turnout
- Fairness and equity
- Transparency
- Facilitate a competitive playing field
- Simplicity
- Streamlined reporting and management

Define the strategies

- Fundamentals
 - Implement expense limits
 - Campaign expense rebates
 - Standardized on-line reporting
 - Requirement for audit
 - Open source public disclosure
- A few simple expense categories
 - Less is better
 - Easy to understand expense categories that represent realistic and typical costs
 - One reporting period (except for rebates)

Establish expense limits and rebates

- Establish expense limits that consider both population and geographic area
- Establish rebates
 - Incorporate into the marketing strategy of the election
 - Designated categories and time periods

Expense limits and rebates level the playing field, in particular if contributions are limited to individuals
Cost of rebates are relatively minor as a tool to promote democracy

On-line reporting with audit

- Develop reporting tool that campaigns can use to manage cash flow, revenues and expenses
- On-line reporting feeds into open public disclosures
- Requirement for audit for campaigns greater than \$5,000
 - Audit to compliance with on-line reporting
 - Provide basic audit rebate (no cost to campaign if books are kept in order)
- Review
 - Expense invoice standards
 - Mileage allowance and entertainment guidelines

Most election campaigns are run by in-experienced volunteers who lack capacity and accounting skills

Too many, confusing categories

23 expense categories (14 federal)

- Continuous periods, except for rebate strategy or expense limits?
 - Consider segregating in-kind expenses
- Eliminate duplication
- Simplify – What is the difference between:
 - Other campaign administration expenses
 - Other campaign related functions
- Include meaningful categories
 - Transportation Costs
 - Food Beverage Costs
 - Volunteer Costs

Impacts of multiple confusing expense categories:

- Inconsistent reporting
- Stifles competition - difficult to compare strategies
- Public distrust of process

14 Federal Expense Categories

- Advertising Radio
- Advertising TV
- Advertising Other
- Bank Charges and Interest
- Depreciation and Amortization
- Donations and Contributions
- Fundraising Activities
- Office Expenses
- Polling & Research
- Professional Services
- Salaries & Benefits
- Travel & Hospitality
- Transfers
- Other



A Voice for Your Values

www.vangreens.ca

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604 689 9200
office@vangreens.ca

November 27, 2015

Re: Submission on Local Government Elections Reform: Expense Limits

The Green Party of Vancouver (GPV) supports the proposed framework for local government elections expense limits. In particular we note:

- Expense limits are long overdue. The current regulations, with no expense limits, are corrupting to the election processes. Using the sample 2014 proposed limits, we note Vancouver would have limits \$106,538 for each councillor candidate. This is the approximate amount spent by all 7 GPV endorsed candidates in 2014 (3 for City Council – 1 elected, 2 for School Board – 1 elected & 2 for Park Board – both elected). As such, we suggest the proposed limits are on the high side, however any limit is better than no limit.
- We agree that elector organizations should share their expense limits with their candidates, thus not giving endorsed candidates an unfair advantage.
- We agree that expense limits should apply from January 1 of the election year to the election day. This is a much more realistic campaign reporting period, in particular from the public's perspective. We trust that this means that the traditional writ period (~5 weeks before election day) would not have different expense reporting requirements.

These proposed regulations do not address the more fundamental issue of BC local government election financing: that there are no limitations as to who can contribute and that contribution amounts are unlimited. This practice is particularly corrupting to the election processes as corporations, non-government organizations, unions and foreigners can contribute and influence who gets elected and how they eventually govern. We strongly recommend that BC adopt similar regulations as Elections Canada, which limit contributors to eligible voters only (corporations, non-government contributors, unions and foreigners are prohibited) and limit contribution amounts (approximately \$1,500 per contributor per year).

The proposed regulations also do not address the issue of the expense categories which currently are numerous, confusing and not meaningful. This is problematic from the

candidate's perspective, who typically run lean campaigns without professional accountants and will result in inconsistent reporting. This is also problematic from the public's perspective who views the inconsistent reporting of categories that they do not understand – this leads to a public distrust of the electoral processes.

Please also see the attached PowerPoint presentation which I delivered in person on November 7, 2014 to the Vancouver meeting of the Special Committee on Local Elections Expense Limits.

The GPV is a municipal electoral organization and has objectives to endorse and support candidates for City Council, School Board and Park Board for the City of Vancouver and UBC Endowment Lands. Like all Green Parties throughout the world, the GPV values are guided by the Global Greens Charter which specifically notes the importance of a strong participatory democracy. You can read more about the Global Green's vision of a strong democracy at <https://www.globalgreens.org/globalcharter-english>

Thank you for considering our comments.

Sincerely

Sent by e-mail

John Whistler
Director

Comments on report of the Special Committee on Local Election Campaign Finance Limits

-By Jordan Bober, Director, Green Party of Vancouver

November 27, 2015

I would like to thank the Special Committee on local Election Campaign Finance Limits for the opportunity to comment on the Committee's final report. I and the Green Party of Vancouver has been a part of this process at every step, because we believe that campaign finance reform is imperative to restoring the health of our democracy.

I was present at the July 23, 2015 meeting held in Vancouver to offer initial feedback on the report together with representatives of other Vancouver elector organizations. The following is a summary of my main comments on the report.

Campaign limits formula fails large cities dominated by elector organizations.

While the Special Committee was struck in part due to calls from citizens in large urban centres like Vancouver to reign in uncontrolled local campaign donations and runaway local election spending, we are dismayed to find that the local campaign spending limit formula proposed by the Committee does little to address the inflated role of Big Money in Vancouver and other large municipalities.

For instance, by our calculations based on the proposed spending limits formula, an elector organization running a full slate of candidates in Vancouver (for Council, Park Board and School Board) could still spend a total exceeding \$3 million in the 2018 civic election. This is not much lower than the record \$3.4 million spent by Vision Vancouver in 2014, and certainly does nothing to help create a more fair, even playing field in Vancouver civic politics (or that of Burnaby, Surrey and other large municipalities whose politics are dominated by elector organizations).

Failure to limit spending in non-election years a concern.

We are concerned that the spending limits being proposed, inadequate as they are for a city like Vancouver, are proposed to apply exclusively to the period from January 1st of an election year to the close of General Voting Day. A lack of reporting and controls on contributions to and spending by elector organizations between election years opens the notion of spending limits easy to circumvent, as large sums invested in party organizing between elections is every bit as much a campaign expenditure as the sums invested in the months leading up to an election period itself.

Further, this loophole makes it possible for elector organizations or candidates to borrow large sums to spend during an election period (as Vision Vancouver did in 2014, spending half a million dollars more than it raised in the period), only to pay off those debts during a non-election year via contributions that they have no obligation to report. We believe it is important that citizens know which individuals and corporations are financially backing civic

candidates and elector organizations as a safeguard against corruption and conflict of interest.

Absence of contribution limits a major disappointment.

While we understand that the Special Committee was not mandated to propose limits on the source or amount of local political contributions, we must nevertheless be on the record as being deeply disappointed by the lack of movement towards the regulation of political contributions as part of this process.

What we hear from the citizens of Vancouver again and again is that the biggest issue with local political finance for them is the influence of very large donors on the political process. In particular, citizens are right to question the motivations of for-profit corporations, unions representing city workers, and private real estate developers when they donate, in some cases, hundreds of thousands of dollars even in the absence of tax incentives for doing so. Such contributions create, at the very least, the perception that large political contributions are rewarded with political decision-making skewed in the donors' favour.

We consider local political *contribution* limits, as opposed to merely spending limits, the far superior policy tool for achieving the objectives of the Special Committee to ensure local elections are fair and democratic. By simply banning corporate and union donations and limiting individual donations, local election campaign spending would be drastically reduced as a result.

Thank you for your consideration of this feedback.

Sincerely,

Jordan Bober

Member of the Board of Directors, Green Party of Vancouver

(Send by email)

Stewart, D'Arcy CSCD:EX

From: s.22 on behalf of Jordan Bober <jordan.bober@vangreens.ca>
Sent: Friday, November 27, 2015 10:07 PM
To: Local Government Election Reform CSCD:EX
Subject: Comments on Special Committee report

Hello,

Please find attached my written comments on the report of the Special Committee on Local Election Campaign Spending Limits.

Sincerely,
Jordan Bober
Director, Green Party of Vancouver

Stewart, D'Arcy CSCD:EX

From: Huntington.MLA, Vicki <Vicki.Huntington.MLA@leg.bc.ca>
Sent: Friday, November 27, 2015 11:42 AM
To: Local Government Election Reform CSCD:EX
Subject: Submission on local elections campaign finance proposal (MLA Huntington)

Good morning,

Attached please find MLA Vicki Huntington's submission to the consultation on the draft *Local Elections Campaign Financing (Expense Limits) Amendment Act, 2015*. Thank you.

Best regards,
Stephen Harrison
Research and Policy Analyst
Office of Vicki Huntington, MLA
250-952-7594
stephen.harrison@leg.bc.ca



Legislative Office:
Room 145, Parliament Buildings
Victoria, B.C. V8V 1X4
Phone: 250 952-7594
Fax: 250 952-7598
e-mail: vicki.huntington.mla@leg.bc.ca

Legislative Assembly
Province of British Columbia
Vicki Huntington, M.L.A.
(Delta South)

Constituency Office:
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www.vickihuntington.ca

November 27, 2015

Local Government Election Reform: Expense Limits
Ministry of Community, Sport and Cultural Development
P.O. Box 9847 Stn Prov Govt
Victoria, BC V8W 9T2

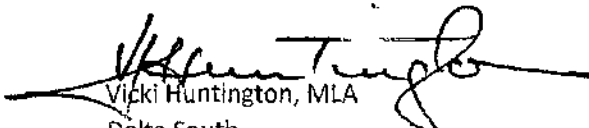
Re: Local government election expenses

I look forward to providing detailed comments on the *Local Elections Campaign Financing (Expense Limits) Amendment Act* during second reading and committee stage debate when the final legislation is introduced next year. In the meantime, I am writing to re-state my belief that any election finance legislation, be it provincial or municipal, will be wholly inadequate until corporate and union donations are prohibited. I ask that the government reconsider its draft amendments and propose such a ban prior to bringing the final legislation to the House.

I have spoken numerous times about the need to remove corporate and union donations from provincial and municipal elections, and have introduced private member's bills and amendments to that effect. I also wrote to the Special Committee on Local Elections Expense Limits to highlight the broad public and local government support for taking big money out of politics.

The government's insistence that corporate and union money has a "legitimate role" to play in our elections is an outdated and inappropriate approach to democracy. The right to influence our democratic process by donating to a party or candidate should be an individual right – a voter's right – not one arbitrarily extended to organizations. If you want British Columbians to re-engage with our electoral process, people need to know that it is citizens, not moneyed interests, that control that process. Alberta, Quebec, Manitoba, Nova Scotia, and the federal government understand that principle and have banned corporate and union donations. A local election finance bill that does any less will do a disservice to our democracy.

Sincerely,


Vicki Huntington, MLA
Delta South

Stewart, D'Arcy CSCD:EX

From: P.M. (Pip) Steele <psteele@zlc.net>
Sent: Friday, November 27, 2015 11:22 AM
To: Local Government Election Reform CSCD:EX
Subject: Bill 43

Attached please find my comments on the Bill 43 as requested in Ms. Reimer's letter of November 5, 2015.

P.M. (Pip) Steele, BCOMM, CFP, CLU, CHFC



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Ministry of Community, Sport & Cultural Development

Attention: Ms. Linda Reimer, MLA
Parliamentary Secretary

Re: Local Elections Campaign Financing (Expense Limits) Amendment Act, 2015 (Bill 43)

Thank you for the opportunity to comment on the aforementioned proposed exposure bill. For reference purposes, I was the municipal Financial Agent for the Delta Independent Votes Association (DIVA) in 2008, 2011 and 2014 plus a By-election in 2010. As well I was the Financial Agent for the Liberal Candidate in South Delta in the 2013 provincial election. I believe I am reasonably cognizant of the reporting responsibilities of candidates and financial agents both before and after Elections BC's involvement in the process.

I raise the following points for discussion purposes.

1. I have no problem with limiting expenses for mayoralty, councillor or schoolboard candidates or the proposed limits based on population. As an Elector Organization in Delta representing both mayoralty and councillor candidates we never reach the proposed limits.
2. A "campaign financing arrangement" is somewhat redundant. Obviously an Independent does not require this document as all their expenses will be incurred personally. With the introduction of spending limits any competent Financial Agent will insist that ALL expenses be directed through the Elector Organization if for no other reason than control. With multiple candidates spending individually as well as organizationally chaos and/or lack of control will ensue. Unlike the provincial election where there is one candidate per party per constituency for spending control purposes the dynamics of a municipal election differ significantly. If the final objective is to manage expense limits why not insist that all elections expenses for Elector Organizations be directed through that organization. Candidates running under an Elector Organization would be forbidden to spend any money individually on their campaign subject to severe penalties. Individual maximum spending limits for mayoralty or councillor candidates would remain within the Organization. Put the onus on the Financial Agent alone to monitor spending. I am sure Elections BC would prefer this restriction when performing their post election audit.
3. Allocating expenses per candidate within an Elector Organization will become a bit of a "mugs" game. Again the newspaper ad or the street sign featuring multiple candidates where one picture is larger than the rest. Does one divide cost equally or allocate more and by how much to the larger picture? For Elections BC to monitor this will be impossible.
4. Albeit mayors and councillors will have individual spending limits the independent is at a disadvantage compared to the candidate associated with an Elector Organization. Take for example Delta. One mayoralty candidate and three councillors would have \$ 157,040 available

subject to limits per candidate. Newspaper or campaign signage using all four candidates at one time gives the Elector Organization and those individuals a substantial advantage versus the independent. Simply put four times the exposure.

5. Keeping financial records from January 1st of the election year is too long in most cases. Most first time candidates whether an independent or associated do not make the decision to run until mid summer. This is especially true in smaller communities. Bank accounts haven't been established. Financial Agents appointed. To go back and have to recreate related election expenses, regardless of how arbitrary, is difficult if not impossible. Was a lunch in January an election expense or a social cost? First time Financial Agents are at a distinct disadvantage. As an adjunct to this getting individuals to act as a Financial Agent gets more and more difficult. By way of an example, a second time councillor in Delta asked and was turned down by no less than six people to act as her Financial Agent. The only option for her was either not run again or act as her own Agent. Once again existing Elector Organizations with their structure in place have a significant advantage on both the independent and the first time candidate.

HOWEVER, the "elephant in the room" is not limiting expenses, contribution limits should also be imposed. By formula if contribution limits are imposed spending limits are somewhat controlled by monies raised. You can't spend what you don't have. Limiting maximum contributions for individuals, companies, union locals or any other group to say a maximum of \$ 3,000 per year would go a long way to control spending and many of other problems that exist with our current system of non regulated contribution limits. It is conceivable that in smaller municipalities with smaller spending limits one or two donors could fund the entire election campaign of one or a number of candidates. This would not become an issue until ninety days after the election when Financial Agents are required to report to Elections BC. Far fetched maybe but without contribution limits also??? I appreciate that contribution limits imposed on municipal elections is the first step to introducing contribution limits provincially. I also appreciate neither the Liberals or the NDP want to go down this road as it would restrict their fund raising capabilities but I digress. At least municipally both sides of the equation should be regulated, not just spending.

Generally speaking municipal elections and provincial elections are significantly different. Having a mayoralty candidate along with a number of councillors and possibly school trustee run under one banner in a municipality versus one candidate one party one constituency are mutually exclusive. Trying to regulate municipal elections using the same formula and reporting requirements as provincial elections albeit both are regulated by Elections BC and introducing spending limits only is flawed by design.

P.M. (Pip) Steele

s.22

Stewart, D'Arcy CSCD:EX

From: s.22
Sent: Friday, November 27, 2015 5:53 PM
To: Local Government Election Reform CSCD:EX
Subject: Local Government Election Reform: Expense Limits (proposed changes insufficient)

Local Government Election Reform: Expense Limits
Ministry of Community, Sport and Cultural Development
P.O. Box 9847 Stn Prov Govt
Victoria, BC V8W 9T2

Dear Sir / Madame,

Getting big money out of municipal elections is essential for a healthy and robust democracy.

Unfortunately the draft campaign finance legislation is completely inadequate. The proposed changes do not tackle the root causes of excessive spending in municipal elections in large urban centres such as the City of Vancouver. Residents of British Columbia have been asking over and over again for meaningful campaign finance reform. The *Local Elections Campaign Financing (Expense Limits) Amendment Act, 2015* does not deliver.

1) **Donation limits are essential.** During the 2014 election, an individual donor gave one of the elector organizations a \$100,000 campaign contribution. The City of Toronto caps the total amount that one individual can give mayoral and council candidates during an election to **\$5000 maximum**. This \$5000 limit is a **combined** amount given to all candidates by a single individual. As well, the **City of Toronto** has implemented **individual donation limits of \$2500 to a mayoral candidate and \$750 to a Councillor candidate**. Please implement donation limits. Limit donations by one individual to a maximum cumulative total of \$5000. A donation limit ties back to the "**principle of fairness**" in the LEEL Report.

2) Allow only one contributor class, **individual residents** of B.C. This change would eliminate corporate and union donations. This is the probably the most requested change. **Bans on corporate and union donations** have been implemented at the federal level. It's time to make this change at the municipal level. During the last election, a corporation gave \$360,000 to one of the elector organizations in Vancouver. This is more than the total amount raised by two of the other established elector organizations. It's not a level playing with corporate and union donations. This is why only **individual residents** should be permitted to contribute to local election campaigns.

3) Require elector organizations to **file annual disclosure forms**. For greater transparency, the filings should be done in an electronic form. It should be easy to **search** through filings online for municipal parties, as it is the case for provincial parties. The current legislation only requires the filing of disclosure forms during election years. In the event that elected candidates receive campaign donations during years between elections, these should also be disclosed.

4) Allow Vancouver to set **lower spending limits** than the province (but not higher). This can be done by amending the Vancouver Charter to allow for Council to lower spending limits via a bylaw.

5) Change the **term of municipal office** back to **3 years**. The extension of the term of office done in 2014 was

never adequately discussed with the residents of B.C. There was no plebiscite and no consent given to increasing the term of office. This is why the 3-year term should be restored.

6) While the final report of the Special Committee on Local Election Expense Limits includes a section on the "Elector Organization Advantage", the report then does not consider this to be a factor.

Only politicians who run under the banners of elector organizations are elected in Vancouver. This has been the case since 1988; Carole Taylor was the last independent City Councillor. In the 2014 election, the top independent candidate received 8,197 votes. The threshold for being elected to Council was 56,831 votes (10th place)

There is a huge advantage to seek office with an elector organization. It is a mistake to allow all contributions from individual campaigns to be centrally spent without making a separate spending limit on the elector organization.

Is it preposterous to suggest that there is no advantage to running in an elector organization? The two largest elector organizations in Vancouver both ran slates of 22 candidates. Instead of having 22 individual offices, running 22 separate campaigns, **an elector organization has clear economies of scale** (one office, set of staff, fundraising, media contacts, volunteer organizers, combined literature, combined media buys, polling). There's also a huge advantage with name recognition. Elector organizations should have **spending limits** of no more than **\$200,000** in the City of Vancouver. That is \$200,000 combined (for all spending by the elector organization and all candidates running under the EO).

7) The formula for spending is much too high for Vancouver. Firstly, there should be no moving scale for larger cities. A spending limit of 4 cents per registered voter for a Mayoral or Council Candidate should be examined, and 2 cents per School Board or Park Board candidate. The spending limits should be **per registered voter** and not per resident.

8) The spending limit formula will allow for approximately **\$2.5 million in spending for Vancouver** elector organizations that run slates of 22 candidates. A full slate would work out to around \$3 million spending in the next election.

For the 2014 election, Vancouver spending limits would have been:

\$202,275 Mayoral candidate

\$103,580 Councillor or Park Board Candidate

\$104,205 Vancouver School Board Candidate (approx, includes UBC lands)

A slate of 22 candidates would have been able to spend **\$2,381,836** in 2014. This limit will be higher in 2018 as a result of population growth.

The proposed legislation fails to get big money out of Vancouver political elections.

Elector organizations should have further caps on spending. The other direction to consider would be to ban elector organizations from municipal elections. This is done successfully in the Province of Ontario. All candidates are independents. Not all cities in Ontario have a ward system. The City of Oshawa elects Councillors with an at-large system. Allowing only independent candidates solves the issues arising from elector organizations.

9) When the 2014 legislation passed, it repealed sections of the Vancouver Charter that required elector organizations to disclose how they paid off debts incurred during an election. Supplemental disclosure forms were submitted by elector organizations that overspent in 2005 and 2008. One of the elector organizations that spent \$400,000 more than it received in donations in 2014 has not filed a supplemental disclosure form as a result. For the interests of transparency and public confidence in the system, the disclosure of donations used to pay down debt is essential. The **"dark money"** raised between elections is not healthy for democracy.

10) The spending limits should be in place for the **entire calendar year** that an election takes place in. Some expenses might be settled after the date of an election, thus allowing a loophole that could be exploited.

11) The proposed reporting rules would create much **red tape** and make it harder for candidates and elector organizations run in elections. The goal of the legislation should be to make it easier for people to seek office.

12) For candidates to show that they are serious about running for office, a large urban centre such as Vancouver should have a minimum requirement of 100 signatures on a nomination form. A minimum of 100 nominators should be on the voters list (otherwise it is difficult to verify that the elector is entitled to vote).

The reforms proposed for **3rd party advertisers** do not go far enough.

1) Third party advertisers taking part in municipal elections **must** not be able to spend more than 5 percent of the expense limit of a mayoral or other candidate.

2) The \$150,000 overarching, cumulative limit **should not be permitted** in municipal elections

3) The campaign period for third party advertisers should also start at the beginning of the calendar year (Jan 1); the 28-day period during the election campaign will result in circumvention of spending limits.

4) **Donations** that are **spent by third party advertisers** should be **subject to the same limits** as donations for candidates and elector organizations (introduce a ban on corporate and union donations, limit donors to individuals, cap amounts per donor).

5) Consideration should be given to a **separate formula for assent campaigns**. These are clearly different from municipal races.

6) **Do not allow the exemption of municipalities, governments and government-controlled organizations from the rules for 3rd party advertisers**. This includes spending limits; governments must follow the same rules as third party advertisers.

7) Any government organized vote should be subject to spending limits, including ones such as a **non-binding plebiscite**. The **transit plebiscite** is a clear example of one vote that should be covered by spending limits. Rules should be no different than for a "referendum"; the transit vote should have been considered an assent campaign subject to spending limits.

Real, meaningful campaign finance reform is direly needed for local elections in British Columbia. The new rules need to work well for all municipalities, including large urban centres. Please address the shortcomings of the current draft legislation and bring our election spending rules in line with best practices. The residents of British Columbia are counting on you.

Sincerely,

s.22

November 27, 2015



British Columbia
School Trustees
Association

November 27, 2015

Linda Reimer, MLA
*Parliamentary Secretary to the Ministry of Community,
Sport and Cultural Development*
East Annex, Parliament Buildings
Victoria, BC V8V 1X4
linda.reimer.mla@leg.bc.ca

Dear Ms. Reimer,

RE: Local Elections Expense Limits

Thank you for your November 5, 2015 letter inviting the British Columbia School Trustees Association ("BCSTA") to provide you with input on the proposed framework for local government elections expense limits which is set out in the *Local Elections Campaign Financing (Expense Limits) Amendment Act, 2015* (Bill 43). We appreciate the opportunity to participate in this consultation process before the local elections expense limit framework is finalized. We have notified our member boards of education of your invitation to submit feedback to government on this matter so that individual boards may consider providing feedback to government through this consultation process.

The BCSTA Board of Directors has had an opportunity to consider Bill 43 and would like to draw your attention to an issue which could arise if Bill 43 is passed in its current form. Bill 43 incorporates the Special Committee on Local Elections Expense Limits' recommendation that "local elections expense limits for candidates apply to all campaign spending from January 1 of the election year to election day". In contrast to the lengthy expense limit period for candidates, expense limits for third party advertisers would apply during a brief 28 day campaign period. Establishing these different timelines for candidates and third party advertisers could lead to the use of third party advertising as a way to circumvent the expenditure and/or reporting rules which apply to local elections candidates. Accordingly, we urge you to reconsider the proposed expense limit periods for candidates and third party advertisers.

BCSTA has made submissions to various government ministries and committees regarding local elections expense limits. For your reference, below please find links to two recent BCSTA submissions regarding local elections expense limits:

1. A transcript of BCSTA's April 15, 2015 submission to the Special Committee on Local Elections Expense Limits is available online [here](#).

2. June 2, 2014 letter to the Honourable Coralee Oakes is available online [here](#).

Thank you for providing BCSTA with an opportunity to provide feedback to you regarding local elections expense limits.

Sincerely,

A handwritten signature in black ink, consisting of a large, stylized 'T' followed by a cursive 'R' and 'e'.

Teresa Rezansoff

President

BC School Trustees Association

Cc: Hon. Mike Bernier, *Minister of Education*
Dave Byng, *Deputy Minister of Education*
BCSTA Member Boards of Education

Stewart, D'Arcy CSCD:EX

From: Reimer.MLA, Linda <Linda.Reimer.MLA@leg.bc.ca>
Sent: Sunday, November 29, 2015 8:59 PM
To: Audrey Ackah
Cc: Minister, EDUC EDUC:EX; Byng, Dave A EDUC:EX; Teresa Rezansoff; Mike Roberts; Local Government Election Reform CSCD:EX
Subject: RE: Local Elections Campaign Financing (Expense Limits) Amendment act, 2015 (Bill 43)

Thank-you Audrey and Teresa!

With kind regards, Linda

Linda Reimer, MLA
Port Moody-Coquitlam
Parliamentary Secretary to the Minister of Community, Sport and Cultural Development for Communities
Cabinet Committee on Secure Tomorrow
Constituency (P): 604 469-5430
Email: linda.reimer.mla@leg.bc.ca



From: Audrey Ackah [<mailto:AAckah@BCSTA.ORG>]
Sent: November 27, 2015 3:49 PM
To: Reimer.MLA, Linda
Cc: EDUC, Minister I EDUC:EX ; Byng, Dave A EDUC:EX ; Teresa Rezansoff ; Mike Roberts ; Local Government Election Reform, CSCD CSCD:EX
Subject: Re: Local Elections Campaign Financing (Expense Limits) Amendment act, 2015 (Bill 43)

Dear MLA Reimer,

I hope that you are well. I am sending the attached letter on behalf of BC School Trustees Association President, Teresa Rezansoff.

Best regards,

Audrey Ackah
Legal Counsel
BC School Trustees Association
4th Floor-1580 West Broadway

Vancouver, BC V6J 5K9
Phone: (604) 235-2290
Email: aackah@bcsta.org

Robertson, Tatiana CSCD:EX

From: Brazier, Heather M CSCD:EX
Sent: Monday, November 30, 2015 6:57 AM
To: Daniels, Carrie CSCD:EX; Robertson, Tatiana CSCD:EX
Cc: Rotgans, Trudy CSCD:EX; Starkl-Moser, Miriam CSCD:EX
Subject: Fw: Civic Election Expenses

For consideration in the consultation summary.

Thanks,
 Heather

From: Reimer.MLA, Linda
Sent: Sunday, November 29, 2015 9:33 PM
To: Brazier, Heather M CSCD:EX
Cc: Whitelock, Riley CSCD:EX; Dick, Joan L CSCD:EX; Reimer, Linda CSCD:EX
Subject: FW: Civic Election Expenses

He is sort of providing feedback here, so am forwarding.
 Many thanks, linda

From: kiichi kumagai <mailto:s.22>
Sent: November 13, 2015 5:15 PM
To: Reimer.MLA, Linda
Cc: Bill McNulty ; Chad Pederson ; Reimer, Linda CSCD:EX
Subject: RE: Civic Election Expenses

Thank you for getting back to me.
 Civic politicians are classed as the third level of Government, closest to the community in their daily lives.
 I would like to make a suggestion that donations to civic candidates should be allowed to write off for tax purposes.
 The Federal and Provincial parties are allowed to give tax receipts to donors.
 Civic donation should have the same privilege.
 Comments welcomed.
 Thank you

From: Linda.Reimer.MLA@leg.bc.ca
To: s.22
CC: s.22; Linda.Reimer@gov.bc.ca; Linda.Reimer.MLA@leg.bc.ca
Subject: RE: Civic Election Expenses
Date: Fri, 13 Nov 2015 21:11:10 +0000

Dear Kiichi,
 Thank-you so much for your email. First of all, let me be clear that a final decision has not yet been made on local government election expense limits. This legislative session we, (government) introduced an Exposure Bill, based on the work of the Parliamentary Committee on Local Government Elections Expense and will be

conducting further feedback. Depending upon this, we, government, may present the bill back as is or something new to the legislature next session.

I have, however, forwarded your email to our staff and here is their reply. You are essentially correct, however, there is some information that could make a difference for your organization.

Bill 43, the *Local Elections Campaign Financing (Expense Limits) Amendment Act*, proposes a per-capita expense limit formula in election areas with a population greater than 10,000. Each candidate would be entitled to an expense limit based on the population of their election area.

In 2014, for the Richmond First Voters Society, each endorsed councillor would have been entitled to \$61,879 based on the City of Richmond's population of 205,262. Each endorsed school board trustee candidate would have been entitled to \$61,879 based on Richmond School District 38's population of 205,262.

It is important to note that elector organizations such as the Richmond First Voters Society do not have separate expense limits from those of endorsed candidates. Endorsed candidates and their elector organizations will need to decide how to share the candidate's expense limit, through a campaign finance agreement. An endorsed candidate may assign all, part or none of their expense limit to the elector organization. When elector organizations spend on campaigns, they will be required to attribute election expenses and track them separately for each endorsed candidate, and ensure that spending does not exceed the amount assigned to the elector organization through the campaign finance agreement.

I hope this answers your questions. Please don't hesitate to contact me if you are in need of any further assistance.

With kind regards, Linda

Linda Reimer, MLA

Port Moody-Coquitlam

Parliamentary Secretary to the Minister of Community, Sport and Cultural Development for Communities

Cabinet Committee on Secure Tomorrow

Constituency (P): 604 469-5430

Email: linda.reimer.mla@leg.bc.ca



From: kiichi kumagai s.22

Sent: November 5, 2015 2:15 PM

To: Reimer.MLA, Linda <Linda.Reimer.MLA@leg.bc.ca>

Cc: Bill McNulty s.22 ; Chad Pederson s.22

Subject: Civic Election Expenses

Thank you for the information.

My name is Kiichi Kumagai ; President Richmond First Voters Society in the City of Richmond.
Please clarify for me please.

Richmond First Voters Society fielded the following number of Candidates for the 2014 Election
Councillor Candidates 4

School Trustee Candidates 4

Does this formula entitle us to spend a maximum of
\$61,879 X 8 Candidates = \$495,032.00 for the campaign?

My email address is s.22

Once again thank you for the information.

Stewart, D'Arcy CSCD:EX

From: Patrick O'Connor s.22
Sent: Tuesday, December 1, 2015 10:39 PM
To: Reimer.MLA, Linda LASS:EX; Local Government Election Reform CSCD:EX; Reimer, Linda CSCD:EX
Cc: Brazier, Heather M CSCD:EX; patrick.oconnor@npavancouver.ca
Subject: RE: Vancouver NPA submission re: Local Government Elections Reform - Local government elections expense limits

Hi Linda,

No problem. Take care.

Patrick

From: Reimer.MLA, Linda [mailto:Linda.Reimer.MLA@leg.bc.ca]
Sent: December 1, 2015 10:20 PM
To: Patrick O'Connor ; Local Government Election Reform, CSCD CSCD:EX ; Reimer, Linda CSCD:EX
Cc: Brazier, Heather M CSCD:EX ; patrick.oconnor@npavancouver.ca
Subject: RE: Vancouver NPA submission re: Local Government Elections Reform - Local government elections expense limits

Thank-you Patrick, much appreciated.

With kind regards, Linda

Linda Reimer, MLA
Port Moody-Coquitlam
Parliamentary Secretary to the Minister of Community, Sport and Cultural Development for Communities
Cabinet Committee on Secure Tomorrow
Constituency (P): 604 469-5430
Email: linda.reimer.mla@leg.bc.ca



From: Patrick O'Connor s.22
Sent: November 27, 2015 1:03 PM
To: Reimer.MLA, Linda <Linda.Reimer.MLA@leg.bc.ca>; Local Government Election Reform, CSCD CSCD:EX
<Localgovelectionreform@gov.bc.ca>

Cc: Brazier, Heather M CSCD:EX <Heather.Brazier@gov.bc.ca>; patrick.oconnor@npavancouver.ca

Subject: Vancouver NPA submission re: Local Government Elections Reform - Local government elections expense limits

Dear Parliamentary Secretary Reimer,

Please find the attached submission from the Vancouver Non-Partisan Association (NPA) in response to your letter of November 5, 2015 in which you invited comments and feedback on the proposed framework for local government elections expense limits, vis a vis ***The Local Elections Campaign Financing (Expense Limits) Amendment Act, 2015 (Bill 43)***. We welcome and thank you for this opportunity to provide our feedback.

Patrick O'Connor
NPA Communications

s.22



November 27, 2015

Dear Parliamentary Secretary Reimer,

Thank you for your letter of November 5, 2015 inviting the Vancouver Non-Partisan Association (NPA) to provide input on the proposed framework for local government elections expense limits, via a visit *The Local Elections Campaign Financing (Expense Limits) Amendment Act, 2015* (Bill 43), tabled in the Legislative Assembly on October 22, 2015. We welcome this opportunity to provide feedback.

As we have noted in previous NPA submissions to the Special Committee on Local Elections Expense Limits and the Local Government Elections Task Force, the NPA supports electoral principles and practices that enhance transparency and fairness, both during and between elections. As an elector organization, the NPA has long taken the position that the Local Government Act and/or the Local Elections Campaign Financing Act should be amended to include election spending limits.

With specific reference to Bill 43, and to your invitation to provide input on the pending legislation, we note that you are seeking comment on four well-defined questions. We therefore offer the following comments:

Question 1: "Are the proposed expense limit amounts for candidates appropriate? Do the limits appear to be too high, too low, or about right for your community?"

As you will recall, representatives from several Vancouver area elector organizations (including the NPA) met with you and Ministry staff on July 23, 2015 to provide feedback on the Special Committee's recommendations. It was noted at the meeting that election spending in most municipalities during the 2014 municipal elections was considered to be reasonable by the Special Committee and that, in most cases, would not have exceeded the proposed spending limits in Bill 43.

However, Vancouver was a noteworthy exception where election spending was considered to be high. In fact, election spending in 2014 by one particular Vancouver elector organization (i.e., Vision Vancouver) would have considerably exceeded the proposed spending limit in Bill 43. Conversely, in

the case of the NPA, the proposed limits in Bill 43 would have allowed our organization to spend more than we did in 2014.

Therefore, although the NPA believes the proposed expense limit amounts for candidates in Vancouver are generally appropriate and reasonable, we would ask that the Legislative Assembly consider per capita amounts that are lower than those proposed by the Special Committee. Under Bill 43, the expense limit amounts for Vancouver remain significant and require extensive fundraising efforts for those hoping to compete on Vancouver's electoral playing field. We respectfully suggest that the Legislative Assembly consider per capita spending amounts that are lower than those contemplated in Bill 43 for population categories over the 150,000 mark to help reduce election spending in Vancouver and other large municipal jurisdictions.

To further address the high level of election spending seen in Vancouver, we also respectfully suggest that the Legislative Assembly and the Special Committee consider the addition of a population category "break point" at the 500,000 per capita point to lower the spending limit (i.e., set a per capita population category amount from 250,000 to 500,000 and a lesser amount thereafter).

As in previous submissions from our organization, we continue to support an election expense limit formula that sets a higher expense limit for mayoral candidates as well as a stepped, "per capita / per elector" expense limit for jurisdictions with populations over 10,000 persons. These are duly and appropriately addressed by the pending legislation.

We also agree that elector organization expenses should be attributed to endorsed-candidates in a reasonable and transparent manner and that legislation must prevent expense limits from being deliberately circumvented or manipulated – for example through multiple electoral organizations working together in order to create a higher spending threshold through, what is effectively, a single campaign.

Overall, we believe that the goal of lowering election spending in Vancouver can be achieved through the proposed expense limit framework. We feel that a Vancouver-specific expense limit is not required and that it would, in fact, run counter to the Special Committee's mandate to maintain election expense rules that apply province-wide.

Question 2: "The funding formula includes a per capita amount (outlined above). Do the population categories work as they are currently defined? Would you recommend a different set of population groupings?"

Previous NPA submissions have referenced our support for a funding formula based on a per elector amount. However, we also recognize that a funding formula based on a per capita amount may be simpler for some jurisdictions due to the fact that population numbers are more readily available; but the basic principle remains the same.

In general terms, the population categories set out in the proposed legislation are appropriate and workable. However, as we noted above, we respectfully suggest that the Legislative Assembly consider adding a population category "break point" at the 500,000 population mark to help reduce

election spending in Vancouver and other large municipal jurisdictions. Likewise, we suggest that a lower per capita amount be considered for population categories over the 150,000 point.

Question 3: "Are the proposed expense limits periods appropriate (January 1 to election day for candidates, 28 days prior to election day for third party advertisers)?"

The NPA has previously concurred with the position taken by the Local Government Elections Task Force that any expenses incurred by third party advertisers should be subject to expense limits and full disclosure. We believe strongly that there should be a level playing field for elector organizations and candidates and that the same expenditure rules and limits should apply to all third party organizations and advertising sponsors. We firmly believe it is crucial that the rules ensure third parties are genuinely and completely independent and cannot collaborate or share data, strategies, or costs with political parties and/or candidates. We feel voters deserve to know who is paying for campaigns designed to influence them, and rules for circumventing the Act must have significant penalties and be enforced.

We also believe that the expense limit period should be the same for elector organizations, candidates, third party organizations and advertising sponsors. For that reason, we are concerned to see that the proposed expense limit period for third party advertisers will only apply during the 28 days prior to Election Day; whereas elector organizations and candidates will be subject to an expense limit period that is nearly a year long. This expense limit period discrepancy appears to be inconsistent with principle of enhanced election transparency and fairness and inconsistent with the objective to create a fair and level playing field.

While we recognize that recent court decisions have limited the Provincial government's ability to control spending by third party advertisers, we still feel it is important that all attempts are made to mirror, as closely as possible, the expense limit periods for electoral organizations, candidates, third party organizations and advertising sponsors. We therefore respectfully suggest that this aspect of the pending legislation be explored more fully and be reconsidered.

Question 4: "Are the proposed third party advertising expense limits appropriate?"

The NPA believes that the proposed expense limit for third-party advertisers is appropriate and warranted, especially given that third parties may not be subject to the same expense limit period as candidates and elector organizations; 5 percent of the expense limit of a mayoral candidate in municipal elections or 5 percent of the expense limit of a candidate in those races where there is no mayoral candidate (e.g., for school trustee or regional electoral area director), with a \$150,000 overarching, cumulative limit.

We also believe it is crucial that the rules ensure third parties are genuinely and completely independent and cannot collaborate or share data, strategies, or costs with political parties and/or candidates. Voters deserve to know who is paying for the campaigns designed to influence them, and the penalties for circumventing the Act must be significant and enforced.

Additional Comments:

In addition to the comments above, we would like to offer the following comments for the Special Committee and Legislative Assembly to consider:

1. We respectfully suggest that the election expense limit legislation being considered by the Legislative Assembly also require financial disclosure by elector organization in non-election years. As previous NPA submissions to the Special Committee on Local Elections Expense Limits and the Local Government Elections Task Force have stated, the NPA supports the implementation of strict rules for periodic reporting in between elections – for example, annual or quarterly reports.

Furthermore, we believe that all funds, services, items in kind, and seconded volunteers from corporations, unions, and non-profit organizations to political organizations should be included in reporting, not only during the campaign period but also in between elections.

2. During the course of the 2014 municipal election, there was considerable discussion around the real or perceived propriety of large donations from single sources such as unions, corporations, and individuals. Although union and corporate donations are not part of the Special Committee's mandate, we would nevertheless like to note the need to review the rules around union and corporate donations, particularly for entities that conduct business with the City of Vancouver and other municipalities and local governments.

We also believe that any elimination of union and corporate donations that may be contemplated by the Legislative Assembly should coincide with tax receipt status for elector organizations equivalent to that which already exists for parties at the provincial and federal government levels.

3. In terms of donation limits, we note that this was not part of the Special Committee's mandate but suggest that it should also be considered by a future review. We believe that any donation limits (as well as financial disclosures) must encompass affiliates and directly associated entities of the donor, as defined by the normal legal definition.
4. As a further step toward local government electoral reform, we suggest that the current exclusion for the disclosure of donations under \$100 should be removed and cash donations should be eliminated entirely. All transactions should be by cheque or electronic transfer in order to ensure appropriate record-keeping. Donations coming from holding or numbered companies should also include proprietor and board information to ensure further transparency and identify who is behind these entities.
5. Rules should also be implemented that compel candidates and organizations to provide their disclosure statements in standard data formats that are easy to analyze and use. For example, disclosures should not be provided in formats that are deliberately difficult to analyze, nor should misrepresentative charts, figures, or messages be included. Disclosures should be designed to disclose information, not to deliver political spin.

6. We are also in complete agreement with the emphasis that the Local Government Elections task force white paper placed on enabling a role for Elections BC in the compliance and enforcement of campaign finance rules in local government elections. As was stated in the white paper, "Elections BC would enforce the limits as part of its role in enforcing campaign finance rules." We strongly support this move, along with further moves to bring local elections under the control of Elections BC.

As we noted in previous NPA submissions, Elections BC has developed a professional, highly regarded electoral finance branch that oversees the disclosure of election contributions and election expenditures, and enforces the compliance of the Election Act of BC. Elections BC is also responsible for communicating and training political parties and candidates about the rules and legislation contained in the Act. This system works very effectively at the provincial level, and we see no reason why the existing structure would not work well if its scope was extended to the local level. Elections BC has the capacity, experience, respect and credibility and we believe it should be responsible for overseeing the reporting and compliance of the Local Government Act and the Local Elections Campaign Financing Act, as well as housing and publishing the centralized donors list of all parties and individuals.

As we stated in previous submissions, most municipalities have neither the staff nor the experience to oversee the reporting and compliance of rules pertaining to civic electoral finance, and asking them to do so risks creating real or perceived conflicts. We continue to have significant concerns about the ability of any election in the province to be conducted with full impartiality, or with the appearance of impartiality, when the administrators conducting elections report directly or indirectly to elected officials. Having Elections BC oversee municipal elections would provide consistent, clear, and comprehensible rules throughout the province.

7. Finally, we continue to assert that the Elections Act of BC, the Local Government Act, the Local Elections Campaign Financing Act, and any other relevant legislation should be standardized and harmonized on an ongoing basis, with civic electoral finance legislation and other relevant provisions mirroring provincial legislation. This would provide consistency of process, clarity of rules, and a clear understanding of the penalties for non-compliance. It would streamline the process for communicating with and training political organizations and candidates, especially given that many candidates and campaigners are active at multiple levels of politics.

Once again, thank you for this invitation to provide our input on the proposed framework for local government elections expense limits, vis a vis ***The Local Elections Campaign Financing (Expense Limits) Amendment Act, 2015*** (Bill 43). Please continue to reach out to our organization, and if we can provide any additional assistance with local government election reform efforts we would be pleased to do so.

Submitted by the Vancouver Non-Partisan Association (NPA) – Jason King, Treasurer.

Stewart, D'Arcy CSCD:EX

From: Starkl-Moser, Miriam CSCD:EX
Sent: Wednesday, May 11, 2016 3:19 PM
To: Stewart, D'Arcy CSCD:EX
Subject: FW: UBCM Letter re: Bill 43 Expense Limits

*Miriam Starkl-Moser
Phone 250 387-4017*

From: Brazier, Heather M CSCD:EX
Sent: Tuesday, December 1, 2015 9:54 AM
To: Rotgans, Trudy CSCD:EX; Daniels, Carrie CSCD:EX; Robertson, Tatiana CSCD:EX
Cc: Starkl-Moser, Miriam CSCD:EX
Subject: Fw: UBCM Letter re: Bill 43 Expense Limits

Letter from UBCM has arrived. No surprises, all good.

From: Marie Crawford <mcrawford@ubcm.ca>
Sent: Tuesday, December 1, 2015 9:49 AM
To: Minister, CSCD CSCD:EX; Reimer.MLA, Linda LASS:EX
Cc: Brazier, Heather M CSCD:EX
Subject: UBCM Letter re: Bill 43 Expense Limits

Dear Minister and Parliamentary Secretary Reimer:

Attached please find a letter from UBCM President Al Richmond in response to Bill 43, Local Expense Limits.

Thank you.

Marie Crawford
Associate Executive Director
UBCM
Phone: 604.270.8226 ext.104
Email: mcrawford@ubcm.ca

The Compass: Weekly News and Information from UBCM – subscribe for free at www.ubcm.ca

November 30, 2015

Honourable Peter Fassbender
Minister of Community, Sport and
Cultural Development and
Minister Responsible for Translink
Parliament Buildings
Room 301
Victoria, BC V8V 1X4

Linda Reimer, MLA
Parliamentary Secretary to the
Minister of Community, Sport and
Cultural Development
Parliament Buildings
East Annex
Victoria, BC V8W 9E2

Dear Minister Fassbender and Parliamentary Secretary Reimer:

Re: Local Elections Expense Limits – Bill 43

On behalf of the UBCM Executive, I would like to extend our thanks for attending our November 27th meeting. We appreciate you taking time out of your busy schedules to meet with us. The purpose of this letter is to respond to the consultation on setting expense limits for local elections, as presented in Bill 43, Expense Limits Legislation.

As mentioned in our August 4, 2015 letter to you Minister Fassbender, the Executive had an opportunity to review the recommendations from the Special Committee with respect to establishing expense limits. We wish to reiterate our feedback from that earlier correspondence with you.

UBCM is supportive of higher expense limits for mayors; a formula that is sensitive to different-sized communities; expense limits that are applied to third parties and limits that will be adjusted, based on inflation.

However, the concern we wish to flag once again relates to the application of the January 1st date to all campaign spending by candidates but not third parties. When UBCM was involved in the Elections Task Force with the Province, two key recommendations came forward – enhancing transparency and ensuring accountability. We are very concerned that by only applying the January 1st date to candidates, we are opening up the possibility of 'back door' financing of campaigns by third parties, a loophole we were trying to close by recommending the application of expense limits to third parties in our 2010 report.

We would encourage you to address this discrepancy. It is imperative that the same rules apply to candidates and third parties to ensure that the principles of transparency and accountability are met.

We would also note that as part of the Elections Task Force work, there was concerted effort to, where possible, ensure that the campaign rules for provincial, federal and local candidates were similar. Not only was this designed to make it easier for election participants who might move from one order of government to another, it was considered to be advantageous for the general public in understanding the rules governing the three election processes. Applying a January 1st date to local election candidates is totally contrary to the rules in place for provincial and federal candidates. The latter have timelines more in keeping with what has been proposed for third party advertisers.

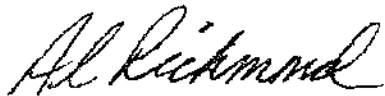
We also wish to advise that we did not formally receive feedback from any of our local government members. We did receive one email from a councillor in a community under 10,000 who felt that having expense limits for smaller communities was not necessary and expressed concern about the amount of paperwork involved for so little dollars, if any.

I wish to reconfirm that UBCM is supportive of the establishment of expense limits but we have included the above comment to echo the concerns that have been expressed by many small communities about the amount of paperwork that candidates are required to complete. Again, I would reiterate that by bringing in expense limits we wanted to ensure a level playing field; making it possible for anyone interested in running for office to do so. However, if in fact excessive paperwork and reporting becomes a deterrent to candidates running, our original purpose has been thwarted.

We encourage you to take these points into consideration as you move toward finalizing the expense limits legislation.

On behalf of the membership and our Executive I would like to extend our thanks for the years of work and consultation that your Ministry has undertaken in order to develop local election expense limits. Thank you for taking our comments into consideration.

Sincerely,



Chair Al Richmond
UBCM President

cc: Heather Brazier, Executive Lead, Integrated Policy, Legislation & Operations, MCSCD